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## **0.1 Introduction**

### **Oxford Local Plan 2040**

0.1.1 Oxford City Council is producing a new Local Plan which will shape how the city develops. The Local Plan 2040 places a strong emphasis upon the concept of the 15-minute city whereby our city is planned in such a way as to optimise the opportunity for people to be able to reach a wide range of facilities that they need to live well and healthily within a 15-minute walk of their home. This provides the opportunity to build strong local communities that enable residents to thrive. The Plan seeks to accelerate the move to net zero buildings and introduces measures such as an Urban Greening Factor to ensure the city is ready to adapt to the impacts of climate change. The delivery of new homes continues to be a priority for this plan, whilst ensuring that we deliver and support mixed and inclusive economic development across the city. The Local Plan 2040, once adopted, will be used in determining planning applications for a wide range of development. We want to ensure that Oxford continues to be a successful attractive city where people enjoy living, working in and visiting.

### **Preferred Options Stage – How it works**

0.1.2 The Preferred Options document contains a series of proposed policy approaches or options which cover a range of topics including housing, economy, communities, and design and heritage. In addition, there is a development sites and infrastructure chapter which sets out proposed sites that may require a site allocation in the plan. All the options are considered at this stage and have been presented as a preferred option, an option, an alternative option or an alternative option (considered detrimental). With each set of options, a short commentary has been included, setting out the potential positive and negative consequences of the approach. The document does not contain draft policies and the options do not contain all of the detail that will be included in the final policy. This Preferred Options document is an important step in policy development which transitions from the issues presented at the previous consultation stage to the draft plan which will be consulted upon next year. Some of the options recognise that they may work best when in combination with another option and if that is the case that has been indicated in the option tables. We have also set out where certain options may require additional technical work to determine their full scope or scale.

We would welcome your views on the Preferred Options Document

0.1.3 We are seeking comments on this document for 6 weeks between Monday 3 October 2022 and Monday 14 November 2022. We have produced a leaflet and questionnaire to help you respond.

0.1.4 The consultation document is supported by several focussed background papers, as well as a Sustainability Appraisal and Health Impact Assessment. There are questions in the questionnaire which will allow you to record your feedback on these documents also.

0.1.5 We are looking forward to hearing your ideas and views about the options in this document.

### What happens next

0.1.6 This is the second stage of public consultation in the development of the Local Plan 2040. The full detail of our timetable for developing the new Local Plan is set out in the Local Development Scheme (LDS) on the website, but the stages are also summarised below:

<b>Issues Consultation</b>	Summer 2021	All comments were considered alongside the evidence and studies and this was used to inform the development of potential policy options
<b>Preferred Options Regulation 18 Consultation <b>We are here</b>  <b>We welcome your views</b></b>	October – November 2022	When this consultation ends we will consider all the comments submitted to us alongside all the evidence base and will start to draft the policies in the Plan
<b>Consultation on outstanding evidence base</b>	January 2023	We are gathering and finalising evidence to support the development of the 2040 Plan following the Oxfordshire Plan 2050 no longer being pursued, once completed this will form another consultation
<b>Final Consultation (Regulation 19 ) This will be a consultation on the draft Plan.</b>	Autumn 2023	When the consultation ends, we will consider the comments but can only make minor amendments.

		We will send copies of all the comments made at this stage of consultations as well as summaries of all the comments received at earlier stages to the planning inspectorate.
<b>Submission of the Local Plan to the Secretary of State</b>	December 2023	Submission of Local Plan to the Secretary of State for Independent Examination.
<b>Local Plan Examination</b>	Spring/Summer 2024	A government inspector will hold a Local Plan Examination to assess whether the policies in the plan are appropriate for guiding Oxford's future development. Hearings will be open to the public.
<b>Adoption of the Plan</b>	Spring 2025	The Plan is adopted by the City Council, it then provides the strategy for the development of Oxford to 2040 and will be used to determine planning applications.

# Oxford Local Plan 2040

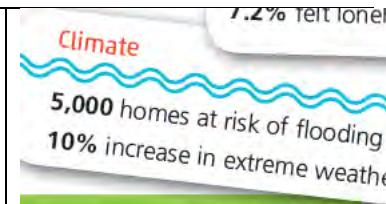
## 1.0 Vision and Strategy

### Where we are

- 1.1 The Issues consultation in summer 2021 highlighted matters that are important in Oxford in order to achieve sustainable development. Threats to achieving quality of life were also identified, which include the impacts of the Covid-19 pandemic, the cost-of-living crisis and the climate emergency. They have brought into sharp relief the need for strong communities, local access to services and facilities including green spaces, the need to limit impacts on the climate through reducing our use of carbon and also to adapt and build resilience to more extreme weather events and ensure that the longer-term impacts on biodiversity are minimised and mitigated. A SWOT analysis (strengths, weaknesses, opportunities and threats) identifies Oxford's Specific situation- the things that need to be addressed and the strengths that can be consolidated.

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	Strengths	Weaknesses	Opportunities	Threats
Natural environment	<p>The city hosts significant habitats and biodiversity and has publicly accessible open space with many functions, including outdoor sport</p> <ul style="list-style-type: none"><li>117 playing pitches</li><li>35 allotments</li><li>248,200 trees</li><li>22.3% of the city has canopy cover</li><li>12 Sites of Special Scientific Interest</li><li>15 historic parks and gardens</li></ul>  	<p>Fragmentation has occurred over time which can weaken ecosystems. Some parts of the city have less access to public green spaces nearby than others. Limited opportunities to create new green, open space.</p>	<p>Green Infrastructure is essential to adapting to climate change, for example as flood storage and by creating shade. Green Infrastructure is multi-functional – able to contribute to many other objectives essential for sustainability e.g. health and wellbeing, carbon sequestration,</p>	<p>Climate change is likely to impact species and ecosystems. Some ecosystems are sensitive to the impacts of development. Development pressure and a growing population could put increasing demands on the city's open spaces.</p>

			<p>setting for heritage, economic growth. Development will provide opportunities to recreate nature connections, enhance biodiversity and to bring more green infrastructure into brownfield sites.</p>	 <p>7.2% of land is at risk of flooding 5,000 homes are at risk of flooding 10% increase in extreme weather</p>
Built environment	<p>Oxford has a rich and valued built heritage of strong and distinctive character.</p> <p>The city is compact with very good access to local centres and the city centres by sustainable modes.</p> <p>Buildings from every period since 11th Century 10 scheduled monuments 18 conservation areas 1500 listed buildings</p> 	<p>Despite the quality of the built environment in some areas, there are other parts of the city where developments have not made the best use of land or have not created successful places. Some areas do not enable easy and safe access to services and facilities. Traffic congestion can be high, which can make the environment feel less safe for cyclists and pedestrians and make public transport less reliable, as well as creating more air and</p>	<p>The compact nature of the city and the wide range of facilities and services mean that there are great opportunities for sustainable and healthy lifestyles, which can be enhanced further by improvements to existing routes or new connections, such as new bridges.</p>	<p>New development that generates car use would exacerbate problems with congestion, undermine the attractiveness of more sustainable modes and how easily and happily people can access goods and services. Additional car traffic would also affect the quality and enjoyment of the streets and spaces</p>

		<p>pollution and wasting time.</p> <p>There are some barriers to moving around parts of the city, such as watercourses and busy roads. Much of our current building stock will require improvements or retro-fitting to meet net zero objectives.</p>		
Community, culture and living	<p>Oxford's city centre and distinctive district centres sit at the heart of local communities and ensure good access to important leisure, cultural, healthcare and education facilities.</p> <p>Oxford has diverse communities and a strong identity.</p>	<p>There is a limited housing stock and high demand, limiting people's access to decent homes in the city. There are pockets of housing deprivation</p> <p><b>2,852 households on housing register Jan 21</b></p> <p>There are wide inequalities in the city - some of the most and least deprived wards in the county sit side-by-side in Oxford. Recent pandemic has exposed and exacerbated inequalities, which could take long time to even out.</p>	<p>The Local Plan can include policies which facilitate the delivery of affordable housing and support high quality, sustainable design. In combination these can support health and wellbeing, net zero and biodiversity objectives.</p>	<p>A growing economy can result in a side-effect of putting more pressure on the housing market, exacerbating issues with affordability. The issues in the housing market will be difficult to resolve.</p> <p>Transient communities can be difficult to absorb into wider society.</p> <p>An ageing population puts more demands on healthcare provision, and attention needs to be given to designing the built environment to</p>

		<p><b>10.5%</b> households in fuel poverty  <b>12%</b> with limiting long-term illness or disability  <b>10</b> out of 83 areas among most deprived in the UK, <b>12</b> in least deprived  <b>29%</b> children live below poverty line  <b>12.4</b> years lower life expectancy for females than males in the city compared to the rest of the UK  <b>Greater Leys than Wolvercote/Cuttance</b>  <b>38%</b> increase in mental health referrals</p>	meet needs of everyone.
Economy	<p>Oxford's economy has strengths in research and development which are helping to find solutions to global problems, such as through development of the Astra Zeneca Covid-19 vaccine. There is diversity in the types of employment, for example with the large BMW manufacturing plant</p> 	<p>There is a lack of high quality office space in the city centre, where there is high demand. Some employment areas are poor to access compared to most of Oxford and do not make efficient use of land. There is a disparity in education and skills of the population and therefore in access to jobs.</p> <p>The compact nature of the city means that there is a limited housing stock and this can lead to difficulties attracting staff, which affects the running of institutions and businesses.</p>	<p><b>62%</b> qualified to degree level</p> <p>Growth of green economy, more demand for technologies like heat pumps, solar PV could strengthen market, create job roles for people in manufacturing, installing these technologies.</p> <p>More focus on 'local' businesses, produce/foods, as international challenges like pandemics, political instability etc compromise</p> <p>The links between the universities, the hospitals and private enterprise create opportunities for ground-breaking developments but even greater focus on highly skilled research and development risks disenfranchising some citizens.</p> <p>Greater automation in manufacturing sector, shifts to online retail and changing job profiles/skills requirements (e.g. more digital) risks disenfranchising citizens, reducing available jobs particularly for lower skilled professions.</p>

			globalised markets and supply chains.	

- 1.2 Oxford is a human-scale city with a rich heritage which has the potential to enable residents to live in a healthy and sustainable way, for example because of the possibility of travelling by active modes such as by bike and on foot, which is why it is such a sustainable location for development, including jobs and housing. Oxford is a place of world-leading science and technology, which should be supported to help provide solutions to some of the issues we all face, such as the climate crisis. Supporting the economy is essential, but it must be ensured that the benefits are widely felt.

## Vision

- 1.3 In 2040, Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, to jobs, to social and leisure opportunities and to healthcare. We will 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, helping provide solutions to global crises. The environment will be central to everything we do; it will be more biodiverse, better connected and 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 more resilient to the impacts of future climate change or other emergencies.
- 1.4 The Oxford Local Plan 2040 will help make sure our city, our environment and our people all thrive together. People and the natural environment are intrinsically linked and care is given to each to enable a high quality of life as the city develops. Social, environmental and economic aspects are considered together to achieve sustainable development.
- 1.5 Within the vision we have proposed for the Local Plan, we have drawn out six themes as illustrated in Figure S1. These include three themes based on the pillars of sustainability and three themes based on the intersections of those pillars. Taken together, the six themes represent what we consider to be a sustainable future for Oxford.

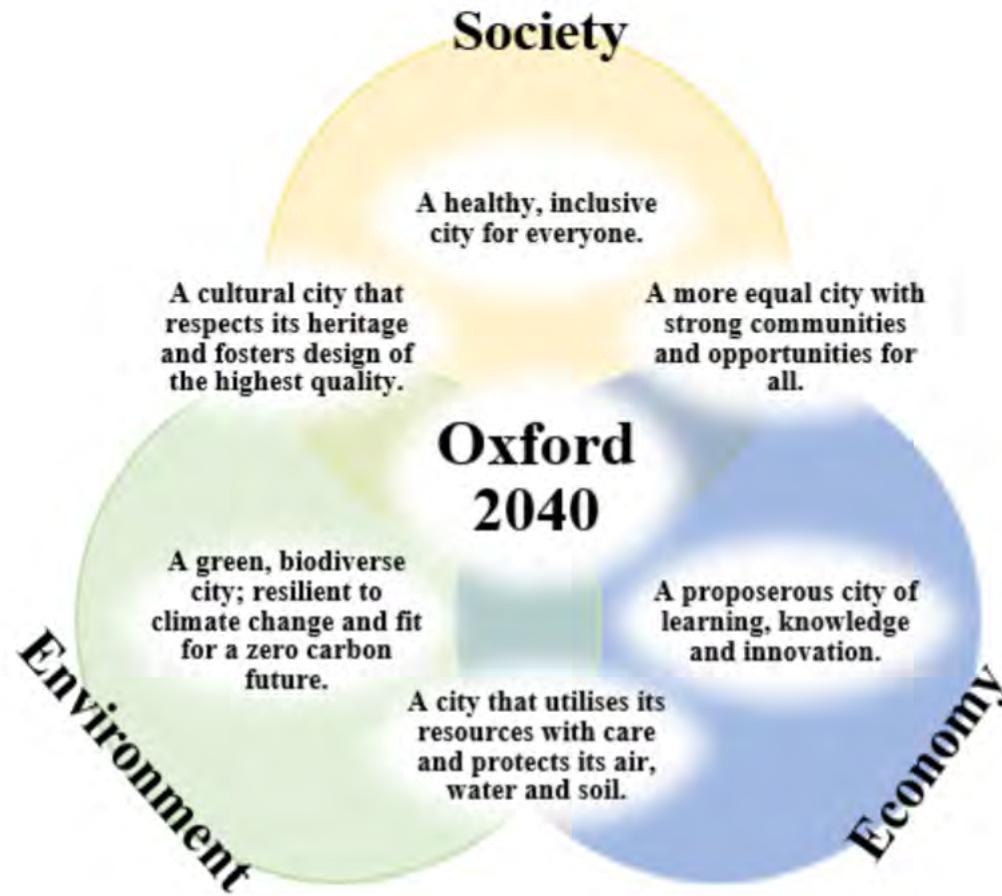


Figure S1: The six themes of the Local Plan 2040

1. In relation to the societal aspect of sustainability, we will be 'a healthy, inclusive city to live in'.
2. In relation to the environment, we will be 'a green, biodiverse city that is resilient to climate change'.
3. In relation to the economy, we will be 'a prosperous city with a globally important role in learning, knowledge and innovation'.

4. Meeting both societal and economic aspirations, we will be ‘a more equal and inclusive city with strong communities and opportunities for all’.
5. Meeting both societal and environmental aspirations, we will be ‘a city of culture that respects its heritage and fosters design of the highest quality’.
6. Meeting both economic and environmental aspirations, we will be ‘a city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.’

## Objectives and strategy

- 1.6 The objectives for the plan set out in more detail how the plan will seek to achieve the vision for the city in 2040. We have developed several objectives that build off each of the six themes within the vision identified above. There are overlaps between the themes and objectives and most objectives could fit within several themes. The policy options shown in this document are arranged according to theme.
- 1.7 It will be important that the policies of the Local Plan are developed in a way that is guided by the above vision and objectives, to ensure that the city’s future is as sustainable as it can be.

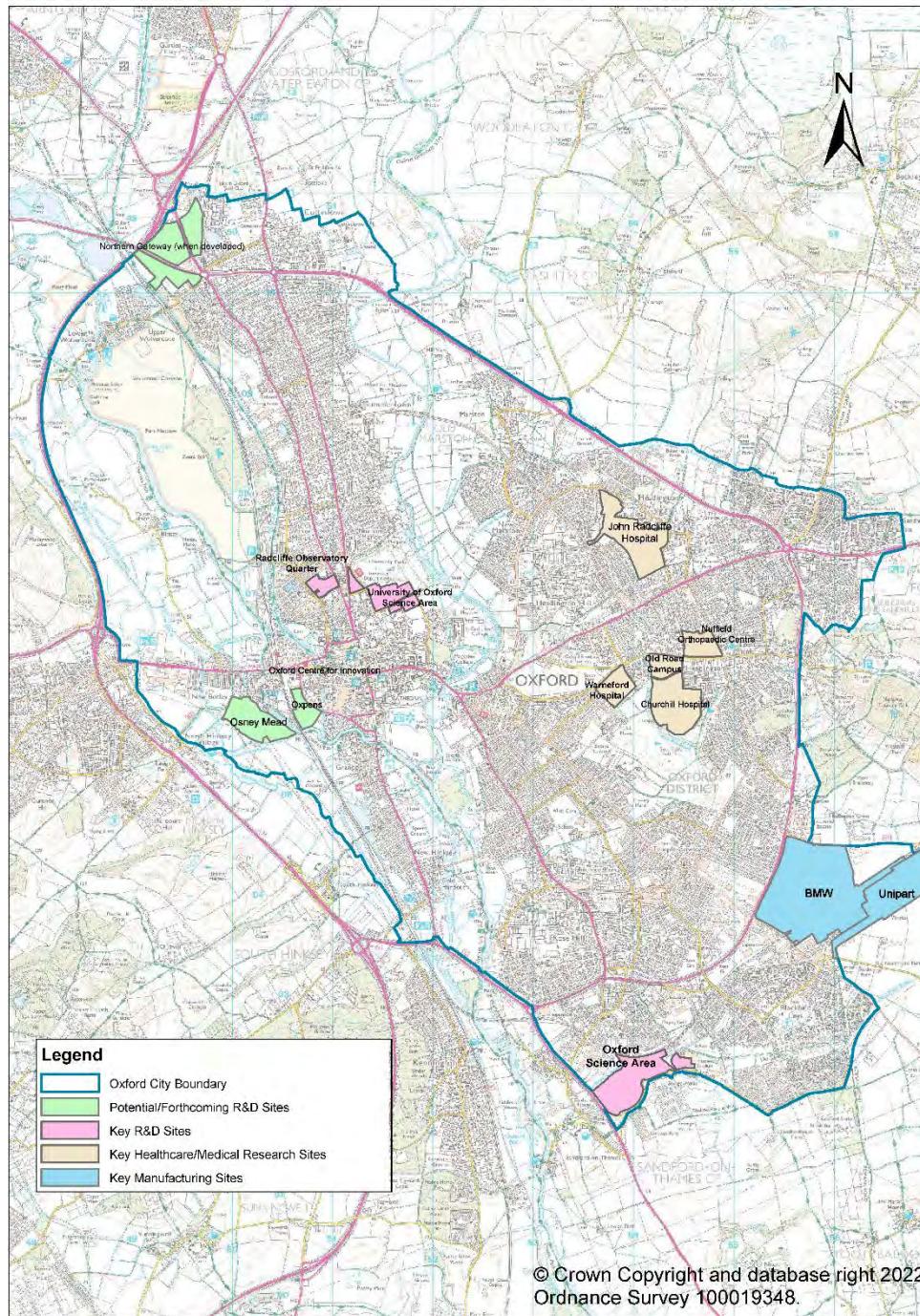
### A healthy, inclusive city to live in

- Access to affordable, high-quality and healthy living accommodation for all.
  - A built environment that supports and enables people to be physically and mentally healthy.
- 1.8 There is a limited supply of housing in the city which has many negative impacts. There is a high housing need, with 3,100 households on the housing register as of July 2022. The median house price of £400,000 is 11.72 times average earnings and Oxford is one of the least affordable places to buy or rent. Inequalities are exacerbated by high prices and the limited supply of affordable housing. This can result in some being forced into overcrowded and unsuitable accommodation. Many people are unable to access housing in the city, which increases commuting and means that employers have a high turnover of staff and have trouble attracting staff, which can affect their functioning, including of the hospitals.

- 1.9 Addressing this housing crisis is a key priority for the plan. The city is intrinsically suitable for housing, able to provide services and facilities, work, leisure, community and cultural opportunities. All places in the city are accessible by sustainable means, and much of the city is within 400m to a 15minute+ bus service, although there are opportunities for improvement. Other than sites already providing important infrastructure, contributing to Oxford's unique economy and helping local communities to thrive, housing should be the priority use.
- 1.10 It is also important that the right kind of housing is provided to best help meet needs. Homes must be built to reduce running costs and the impact on the environment and be comfortable to live in. A variety of housing types, sizes and tenures should be available across the city to ensure balanced communities and to meet the differing needs of a wide range of people. Balanced communities will be created, suitable for a range of different types of people and avoiding concentrations of any one type of housing, for example only large and expensive units, only small units that exclude people with children and concentrations of student accommodation. However, different site and area contexts will make different mixes suitable. The city centre and district centres are most suitable for high density developments with a wider range of small units.
- 1.11 The pandemic has also highlighted the importance of healthy internal and external spaces and setting standards for these. Both open space where we can be active and meet others safely, but also the importance of space within the homes and offices in which we spend so much of our lives. The pandemic has demonstrated that the home has had to become a space to work, to exercise, and to teach our children. The adjustment has been far more challenging for those without ample indoor space such as those living in overcrowded accommodation, shared houses and homes that have not been built to a standard that can accommodate such use.

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

- To build on the city's strengths in knowledge, healthcare and innovation.
- To support the city's recovery from the Covid-19 pandemic and build resilience to future pandemics and economic challenges/shocks.
- Opportunities for education, learning and skills development.



*Figure S2: Key economic sites*

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- 1.12 Oxford's strength in knowledge, healthcare and innovation is not accidental and it should be supported and allowed to develop. Oxford's contribution to the knowledge economy stems from Oxford's long history as a seat of learning and is part of what gives the city its identity. The research and development in Oxford, and in Oxfordshire but closely linked to Oxford and the universities, is finding solutions to global problems such as pandemics, endemic diseases and climate change. The universities and hospitals are key to the success of the knowledge economy in Oxford and many of the research and development locations are closely linked, for example at Old Road and on the hospitals themselves, the Science Area and Keble Road Triangle, the ROQ and the city centre. Other well-established areas include the Oxford Business Park, the Oxford Science Park and Headington. Development is in the pipeline at Oxford North and within the West End and Osney Mead area. The city provides a network and the location of areas of employment in locations easily accessible by walking, cycling and public transport and close to other facilities and homes encourages synergies and reduces the need to travel by car.
- 1.13 There are potential benefits for residents of Oxford being at the forefront of much research and development, in terms of healthcare and further and higher education opportunities and the availability of more well-paid jobs and different entry points to the labour market. However, more will be done to ensure opportunities are broadly felt, for example by ensuring a broad employment base with opportunities for smaller businesses and start-ups, greater sharing of facilities and more links between research and development and education and skills-building opportunities.

### A green, biodiverse city that is resilient to climate change

- Supporting strong, well-connected ecological networks and securing net gains in biodiversity.
- Ensuring the city is resilient and able to adapt to the impacts of climate change.
- A city that is resilient and resistant to flood risk and its impacts on people and property.
- A city with a green and blue network that is protected and enhanced.
- Accessible open spaces for all with opportunities for sport, food growing, recreation, relaxation and socialising.

- 1.14 Green spaces and green features bring multiple benefits. They are important to mental health and wellbeing, from merely viewing greenery, by being in green spaces and exercising in them, and having space to play and to interact with others. Green spaces help define local character and community, helping bring a sense of place and togetherness. They can offer food growing and flood storage. They provide habitats for biodiversity.
- 1.15 Connections between green spaces are important because it helps strengthen habitats for biodiversity and can provide attractive green routes for people to walk and cycle along. Connections should be protected and enhanced where there are opportunities to. New green spaces should be provided with consideration of continuing and joining habitats. Green spaces should be enhanced
- 1.16 All new developments should include green infrastructure features so that the opportunity is taken for development to enhance green infrastructure. Green infrastructure should be designed to a high quality, contributing to sustainability of the local area in a range of ways, such as through supporting health and wellbeing, biodiversity and climate resilience (multi-functional).
- 1.17 Adapting to and building resilience to climate change is essential, because it can't be prevented entirely. Green features help lessen and manage the impacts of flooding. They also provide shading in the summer, which will be important as longer periods of hotter days are expected.

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

- Ensuring the city is ready for a net zero carbon future
- Ensuring that resources including land, soil, water, and raw materials are used prudently and with consideration of replenishment and renewal.
- Air quality and its impacts upon public health is improved.
- Protecting the quality of natural resources and ensuring human health is safeguarded

- 1.18 Resources are finite so must not be wasted. With all the competing development needs, land is a precious resource in Oxford that should be used wisely, with promotion of recycling and reuse where possible. It is also important that the quality of resources is maintained or improved, for example air, water and soil. Pollution that stops ecosystems, and people, functioning well should be avoided, and planning policies have a role in this. Oxford has areas of high biodiversity value that are often sensitive to pollution or changes in surface water or ground water flow. Development must be managed to prevent harm.
- 1.19 Land is a particularly limited resource in this constrained city, so it must be used wisely, for the right uses and at high but appropriate densities. Development should be well-designed so it stands the test of time, which means it should be flexible enough to respond to changing needs. Re-using land will also be important. Sometimes this will mean sites are more difficult to develop, because of the value of existing uses, contamination and other constraints, and this means policies should manage this process to ensure safe developments.
- 1.20 Air quality is already poor in parts of Oxford. This can have significant negative impacts on health and consideration is given to the impacts of new developments and on the users of new developments.
- 1.21 It is vital that every effort is made to reduce the impact of development in Oxford on climate change, as well as ensuring we are resilient to climate change. Actions which seek to reduce and prevent greenhouse gas emissions (climate change mitigation) will be important for contributing to achieving the UK's legislated goals of being net zero by 2050, and the city's own target of net zero by 2040. The planning system is ideally placed to help deliver action on climate change and national policy is clear that this is vital to good planning.
- 1.22 Climate action is now central to everything that the Council does and the Local Plan is one of the tools to help us achieve the City Council's vision to achieve net zero carbon Oxford. The Council joined many other local authorities in declaring a

climate emergency in September 2019 and the Council has set ambitious zero carbon targets for its own estates and operations and the wider city<sup>1</sup>.

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

- Well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to.
  - Valued and important heritage is protected and enhanced.
- 1.23 Oxford has a distinctive sense of place. Its built heritage reflects the way it has evolved over time, as a significant seat of learning, and as a seat of government, local and at times national. Industry has been important, with the factory of Morris Motors for example. Healthcare and developments in treatments have also been important in Oxford. Parts of Oxford were originally small rural settlements, and this history is still clear in its built form and interrelationship with green spaces. This development is reflected in the built environment and recorded in the archaeology.
- 1.24 The landscape Oxford and its relationship to the built environment of Oxford City is of great significance. It is recognised worldwide for its distinctive buildings, skyline of domes and ‘dreaming spires’; interweaving rivers and meadows set within a rural framework, are contained by wooded ridges. The Oxford landscape consists, however, of more than these ‘iconic’ features and the evolution of the urban form, cultural associations, relationship of the public and private realms, the density and massing of buildings, the architectural dialogue and vitality, and the way humans have interacted with it through time, all make an important contribution to the character of the city’s built-up areas.
- 1.25 It is not only the historic environment that is significant in Oxford; there are many modern buildings of high quality and distinctive design that adds to Oxford’s story. New development must respond to this context, adding to and enhancing it, being designed to suit what it is to be used for, to last, to fit its context and tell its own story. The Local Plan can encourage

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<sup>1</sup> These targets include:

- Zero emissions council by 2030, or earlier
- Net zero city by 2040 - put forward by, and adopted by, Oxford City Council and 20 other major local organisations in the newly formed Zero Carbon Oxford Partnership. (Includes 5-yearly interim targets).

adaptations and allow thoughtful improvement/retro-fitting of existing buildings so that they can better respond to climate change and net zero objectives.

## A more equal and inclusive city with strong communities and opportunities for all

- Our neighbourhoods have all the facilities we need to support our daily lives and are within fifteen minutes' walk from our doors.
- People are well-connected digitally and enabled to use new technologies to support their jobs, social lives and meet their everyday needs.
- To have thriving local centres that support a variety of uses and foster activity throughout the day and night.
- A city that continues in its role as a national and international destination for tourists and workers alike.
- Valuing diversity whilst fostering greater inclusivity within our communities.
- Supporting modal shift, to more sustainable/active forms of transport, including by limiting the need to travel.

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- 1.26 The Covid pandemic has shown us the importance of our local areas and the various services and spaces that are just on the doorstep. The benefit of having access to local amenities, like shops and pharmacies and open spaces in which to exercise and meet other people, without needing to rely upon a car, have become apparent for many. Yet this proximity is not always equal, and a lack of access to such spaces and facilities has unfortunately become even more apparent for others.
- 1.27 Concepts like the 15–20-minute neighbourhood, whereby communities have access to all of their daily needs within a 15–20-minute walk or cycle ride, have become increasingly popular approaches to the way we think about the planning of our local areas. Because of the accessibility and compactness of Oxford and that cycling is not practical for a lot of trips for many people, we are using a 15-minute walk distance as a measure. To have most of our shopping, jobs, health, socialising and recreational needs within a short walk or cycle would not only reduce the negative impacts of future pandemics, but also promote healthier and more active lifestyles as well as reduce our impacts upon the climate and the natural environment. Such functioning neighbourhoods offer the opportunity for communities to have a sense of belonging and more investment in their community.

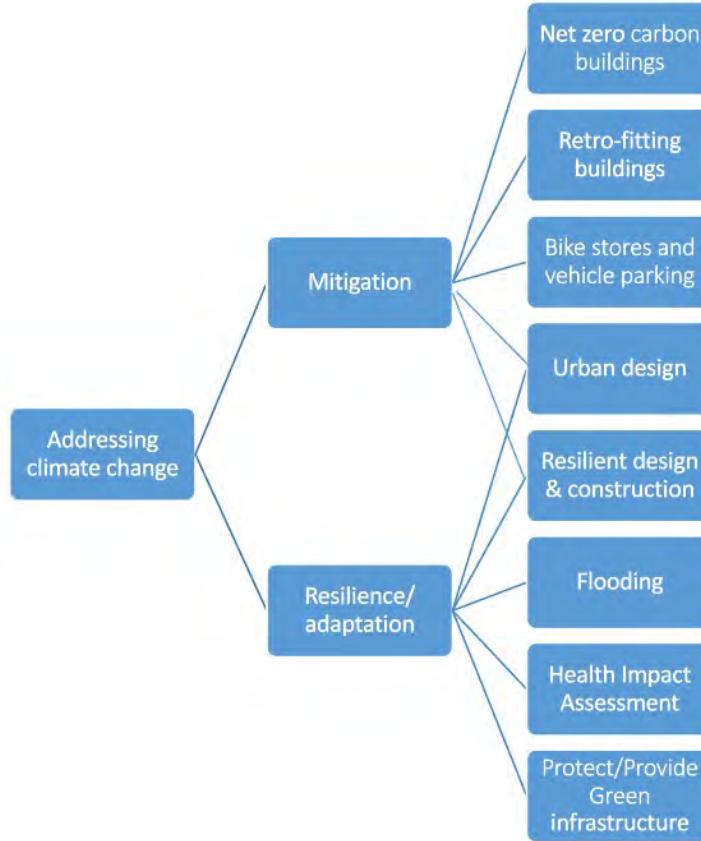
- 1.28 This is very achievable in Oxford, but there are areas without such good access. In order to overcome this, we will consider whether there are opportunities to enhance connections to existing facilities or to enhance infrastructure provision within an area of deficit.
- 1.29 Oxford city centre has a very particular role as a primary focus for a wide range of shopping, employment, leisure, education and cultural activities, as well as being a major tourist destination, and it is vitally important to the overall success of Oxford. It draws visitors in from all over the city, the county, and much further afield. Managing visitors in a way that still enables a good visitor experience is important, so that the success of the centre is maintained, and facilities can thrive. Ensuring a city centre that is relevant to local residents is a key aspect of the City Centre Action Plan and it is important that there is the right mix of activities and attractive and accessible public realm for people to meet and linger.
- 1.30 The pandemic has also necessitated an increased reliance on digital technology and the internet. Not only have we relied on video calling technologies to make connections with others, either for work or for socialising, but more of us have also turned to using the internet for shopping, for ordering food, and consulting with doctors or learning. The digital divide has become starkly highlighted, and those without adequate access to technology, or with poor connectivity, have struggled far more to adapt to the changing world than those who do have access. Digital connectivity has become just as important to the way we live as physical connectivity and needs to be secured through the Local Plan.

5

## Overarching threads

- 1.31 There are three particularly important threads which are wound throughout the options document, these relate to key issues and/or challenges facing the city which require a multi-faceted response which cannot be separated neatly into any one of the six themes discussed above. Some of the policy options sets presented in this document contribute to addressing these key issues directly, meanwhile, others have a more indirect but supporting role in addressing them.
- 1.32 The first thread is that of addressing climate change. In terms of reducing our emissions (climate change mitigation), there are policy options that set out our expectations for net zero development and supporting retro-fitting of existing buildings, meanwhile policy options that address good urban design, parking, and bike storage should all enable people to live lower carbon lifestyles. Equally, a diverse range of policy areas can support adaptation and resilience to the expected impacts of

climate change, from resilient design and construction (which includes concerns around overheating), to flooding, green infrastructure and health impact assessment.



*Figure S3: How the policy options sets seek to address the issue of climate change*

- 1.33 The second overarching thread which the various policy areas are trying to address is that of reducing inequalities in the city. We have included policy sets which are aimed at supporting access to affordable housing, as well as a good mix of housing, in order to help address housing inequality. Equally, we have included policy sets aimed at addressing unequal access to

affordable  
improve  
wellbeing

employment and training through options for policies requiring employment and skills plans as well as provision of workspaces. Policies that relate to protecting, enhancing and providing new green infrastructure should also help to improve the natural environment across the city, whilst health impact assessment is aimed at ensuring that health and wellbeing (including health inequality) is considered in new developments over certain thresholds.

- 1.34 Meanwhile, the third overarching thread which runs throughout the document is that of 15 minute neighbourhoods and ensuring that local residents have access to all their daily needs within a 15 minute walk of their home. There are a variety of sets of policy options which tie into this overarching thread, in particular, the strategic policy options including the overarching spatial strategy which sets out where types of development ought to be focussed in the city. Equally, there are options which focus on more specific aspects of our neighbourhoods including town centre uses, community assets and green infrastructure (e.g. green spaces). The areas of focus and infrastructure needs chapter considers key infrastructure needs in different areas of the city which will be equally important to ensuring the sustainable growth of our neighbourhoods and supporting the development coming forward.



Figure S4: How the policy options sets seek to address the issues of reducing inequalities and supporting 15 minute neighbourhoods

## Strategic policy options

### Strategic spatial strategy

#### Directing new development to the right locations

- 51
- 1.35 Fundamental to achieving the vision and objectives of the Plan will be directing the right types of development to the right locations. Considering the declaration of a climate emergency, the importance of promoting and enabling travel by walking, cycling and public transport rather than the private car is clear. We expect that strong local communities with facilities, services and green spaces in proximity will continue to be something people value highly. The idea of the 15-minute city is a good template for making strong local communities that enable residents to thrive. Having facilities and developments that attract people available locally and concentrated at public transport hubs, so that people can access them in joint trips, quickly and easily without the need to drive, helps to achieve the objective of reducing car use and promoting healthy lifestyles and strong communities.
  - 1.36 Oxford is fortunate in having a very strong public transport network, with hubs at the district centres and the city centre. There is generally a good availability of employment, facilities and services, again focused on district centres and the city centre, as well as some other large key employment sites on the edge of the city such as the Science Park and BMW MINI plant.
  - 1.37 Significant needs for housing and employment use have been identified in Oxford, and limited land means that these need to be prioritised. Encouraging new developments in the right locations is key to meeting these needs sustainably. Uses that attract people should be located at existing hubs that are already well served by public transport. This also helps to ensure that facilities people need continue to be available locally, in walking distance of homes. Any further scattering of uses that attract people would be detrimental. Prioritising housing outside of these areas will help get further to meeting the significant need for housing.

<b>Strategic Policy Option Set S1: Directing new development to the right locations</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Include an overarching spatial policy which sets out a strategy for where different types of new development can be located, for example employment, leisure, housing and student accommodation. Set out broad principles for locating development. Key principles are likely to be strengthening local hubs (city centre, district centre), achieving 15-minute city (facilities clustered in centres, accessible by public transport and walking and cycling), meeting housing need, neighbourliness/amenity, supporting Oxford's national and international role in research and development. Detailed policies relating to each type of development may be included in the themed chapters of the plan.</b>	This enables the aims and objectives of the strategy to be captured and expressed in a policy that is clear and upfront about suitable locations for different types of development. Setting out these broad principles should very clearly show the considerations that are important in locating new developments of various types. This should be followed in allocating sites but will also then be clearly set out to enable assessment sites that come forward which have not been allocated, to see whether they meet the strategy.	This could be unnecessary because details will be in thematic policies. There will need to be a clear justification for allowing certain types of development only in certain locations. Also, this could restrict the potential for certain needs to be met if the locations are too restricting. Whilst it will be necessary to prioritise uses and ensure a balance, there cannot be unreasonable restrictions that prevent other aims of the Plan and NPPF from being met.	Preferred Option

### Defined district centres, city centre and local centres

- 1.38 Hubs need to be defined to provide the focus for development which attracts people who can benefit from their wider range of uses. The hubs aim is to maximise access by foot within 15 minutes. This can be ensured and supported with policies

that maintain the vibrancy of the hubs and consider potential access improvements. It is important to consider the potential for new areas to act as hubs and to therefore be included in a policy protecting them. As well as the city centre, Summertown, Headington, Templars Square, Blackbird Leys and Cowley Road act as district centres, with excellent public transport links and a range of shops and other facilities and work places such as offices, libraries, community centres and parks. The map in Figure S5 shows the areas within 15 minute walking distance of one of these centres (measured from a centre point, as true walking distances).

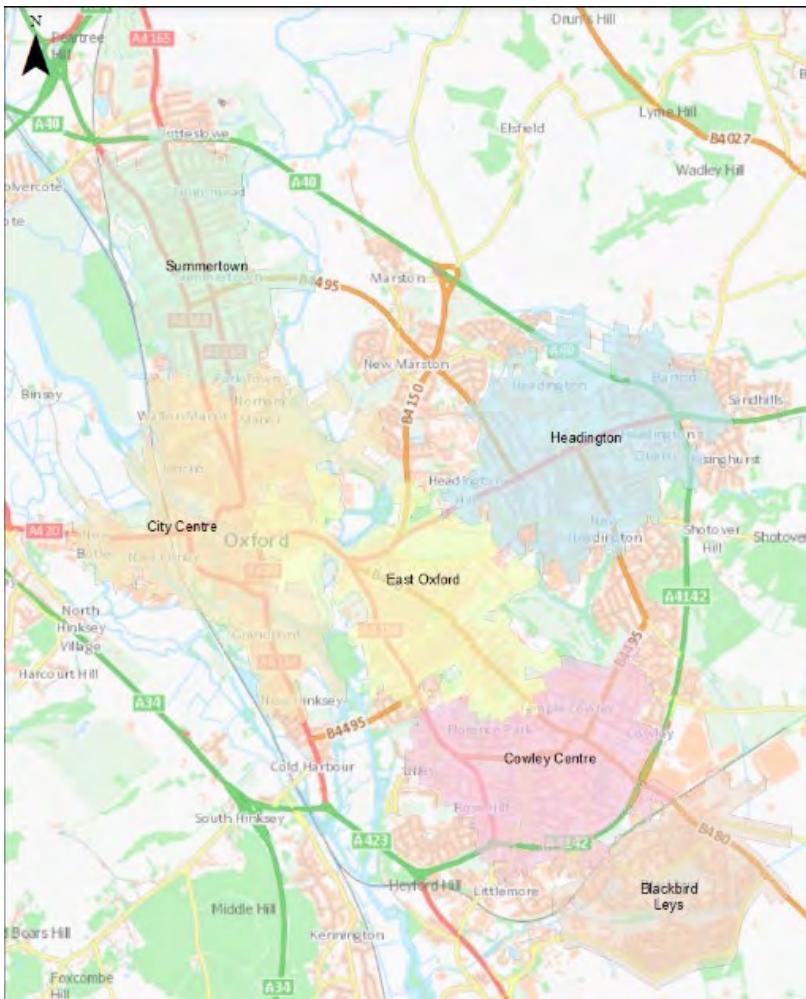
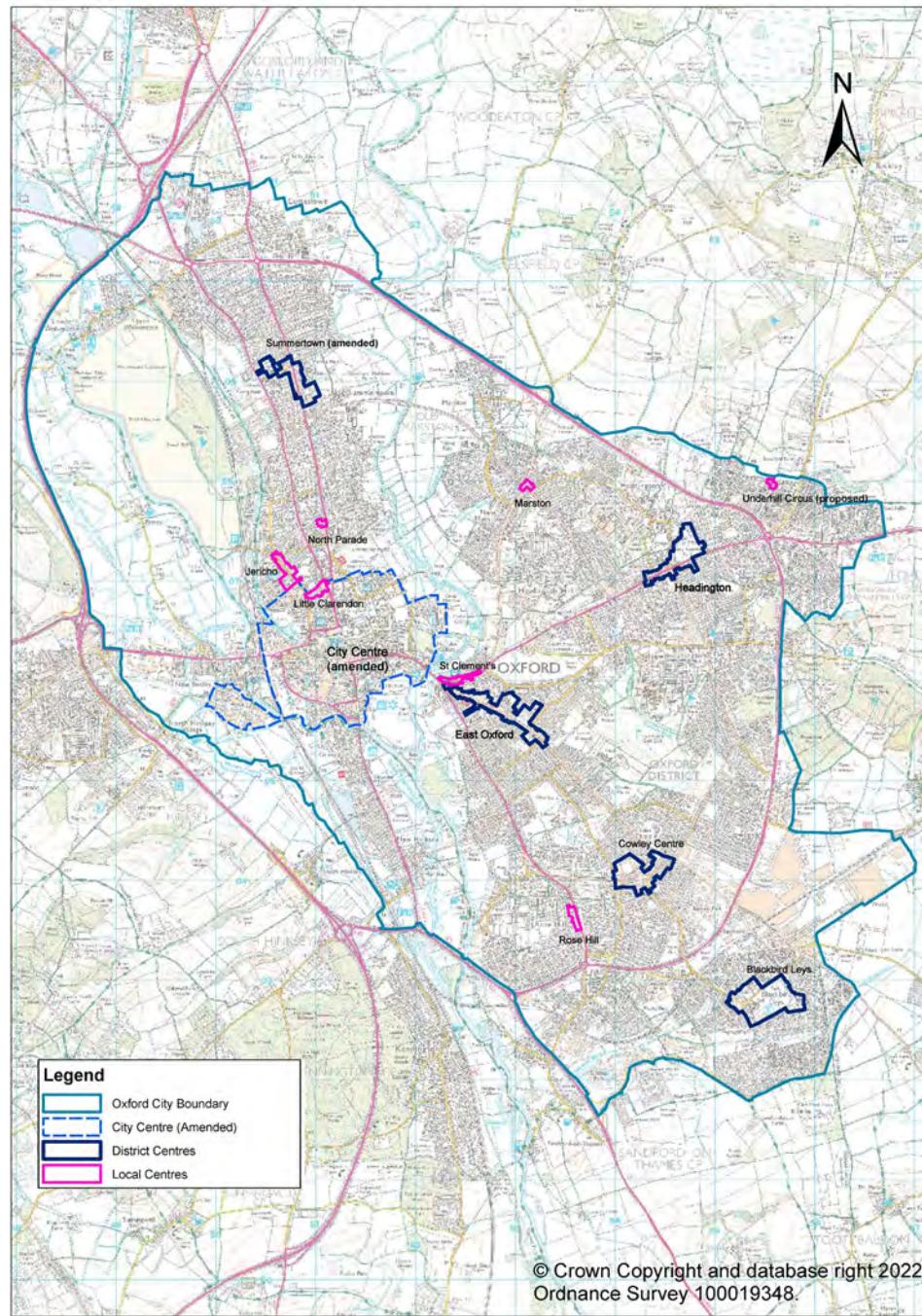


Figure S5: The areas within 15 minute walking distance to centres

1.39 Most of the city has very good accessibility to a centre. However, there are clearly a few areas outside of this 15 minute walk. In addition to district centres, there are local centres, which have a much smaller range of facilities, and which are

often slightly less well connected by public transport. These may not be suitable for a full range of facilities such as hotels, student accommodation and so on, but they are important to protect as they can act as a community hub and ensure essentials are within a 15-minute walk of more people. A number of local centres are protected in the Oxford Local Plan 2036. This list has been reviewed and it is proposed that Underhill Circus is added to the list of local centres to be protected, see Figure S6. Boundaries have been reviewed since those in the Local Plan 2036 to ensure they include all the key facilities for people that are in the centres, including parks and schools. Nearly all the city has 15-minute walking access to one of these district centres or local centres.



*Figure S6: City centre, district centres and local centres*

## Approach to greenfield sites

1.40 All greenfield sites have been assessed as to their appropriateness for development to ensure those that need protection are protected but not to result in a blanket restriction on development if land is suitable for development. Such an approach ensures proper consideration of both greenfield and brownfield sites and highlights the importance of the value of green spaces and thus the need for their protection whilst demonstrating that every attempt has been made to identify all possible development sites whilst ensuring protection of sites that should be protected.

Strategic Policy Option Set S2: Approach to greenfield sites				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Assess all greenfield sites and set out reasons for their protection. Direct development away from protected greenfield sites. However, do not have a blanket protection of all greenfield sites. Do include policies to maximise efficient use of land on brownfield sites. This will include a review of Green Belt to assess whether there are any sites in the Green Belt that could come forward, that are not biodiversity sites or flood storage and would</b>	<p>This approach allows careful consideration of all sites whilst recognising brownfield sites are the most appropriate for development. Setting out the importance of green spaces and reasons for protection strengthens those protections. This approach shows that we are attempting to meet our needs by identifying all possible development sites, whilst at the same time ensuring strong protection of sites that should be protected.</p>	<p>With this approach, it is likely that some greenfield sites will be developed, and even if they are assessed as being of lower quality and not worthy of protection, or possible to re-provide, they will have some function and value to local people.</p>	Preferred Option

	<b>not have an unacceptable impact on the integrity of the remaining Green Belt.</b>			
<b>b</b>	<b>Allow development on greenfield sites only if no brownfield sites are available and needs are not being met on brownfield sites.</b>	This maximises use of brownfield land. All green spaces have some value.	It is unlikely this approach could be justified in Oxford where so many needs are unmet because of the limited amount of land. If needs are not met in Oxford then they will need to be met in surrounding authority areas, where there is also limited brownfield land and where that is likely to result in greenfield site allocations. Not all green spaces will have a value that outweighs the benefits of development. Whilst the NPPF sets out the importance of protecting green spaces and focusing on brownfield land, it does not set out a brownfield first approach.	Alternative Option

## Delivery

1.41 It is important that the policies of the Plan are deliverable. The following strategic policies are proposed which would set out how infrastructure and contributions will be secured, how viability will be considered

### Infrastructure considerations in new development

Strategic Policy Option Set S3: Infrastructure considerations in new development				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Set out that infrastructure (physical, social and green) will be required to support new development, and that measures will be secured by means of planning obligations, conditions attached to a planning permission, funding through the Council's Community Infrastructure Levy (CIL) or other mechanisms.</b>	This approach makes it clear that contributions to infrastructure will, many cases, be needed and the mechanism by which they may be secured.	These mechanisms will exist whether or not they are outlined in a policy.	Preferred Option

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## Viability considerations

- 1.42 As the options are developed into more detailed policies it will be necessary to appraise the whole plan viability. This will help bottom out details of percentages, thresholds and so on that the options currently can only give examples of, often based on what is currently set out in policy. The current climate means that building materials and labour are hard to obtain and expensive, which will inform thresholds and levels of policy requirements. However, in addition sometimes sites do face exceptional costs that could not have been anticipated in a general whole-plan viability assessment. Setting out the basis for negotiations relating to viability as part of the Plan helps to be clear on priorities and expectations for evidence

Strategic Policy Option Set S4: Viability considerations				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Include a policy that sets out that if an applicant can demonstrate particular circumstances that justify the need for it, a viability</b>	The policies of the local plan will be drafted in the context of a whole-plan viability report and set at a level that will be viable. However, there is	Including a viability policy could result in key aspirations of the plan to be lost in particular the Council's ambition to	Preferred Option

	<p><b>assessment may be carried out and submitted by the applicant as an open book exercise. Where affordable housing is included on the site and it can be demonstrated that the affordable housing requirement is unviable, a cascade approach should be worked through to lessen the burden of affordable housing, and this cascade will be set out. Other policy requirements that are likely to be costly and which could therefore be adjusted to help achieve viability are zero/low car parking and carbon efficiency, and these will also apply for developments that do not have affordable housing. Relaxing standards for first car parking and then carbon efficiency will be considered if justified through a viability assessment, required because of site-specific circumstances, and a cascade would be set out.</b></p>	<p>always potential for site-specific changes in circumstances resulting in development occasionally becoming unviable. In these circumstances, negotiations will need to take place so that development can go ahead in a way that ensures maximum compliance with planning policies. This approach enables priorities to be set out clearly from the outset, and can show what will not be negotiable.</p>	<p>reach Net Zero by 2040. In addition it could result in the reduction in the delivery of affordable homes across the city which is a key council priority. Reducing the opportunities for car free homes could result in more congestion across the city at a time when the County Council is seeking to introduce more measures to tackle traffic congestion and deliver more infrastructure to support walking and cycling across the city.</p>	
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## Presumption in favour of sustainable development

- 1.43 The Preferred Options document reflects the presumption in favour of sustainable development. There is generally a positive approach to development where it has positive benefits in terms of sustainable development and is in compliance with the development plan or National Planning Policy Framework.

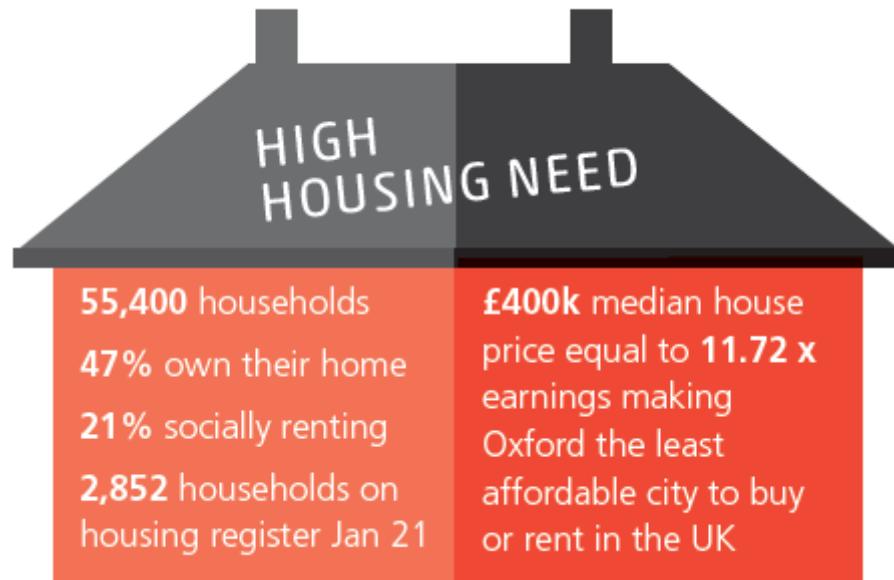
Strategic Policy Option Set S5: Presumption in favour of sustainable development				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Include a presumption in favour of sustainable development. This would set out that planning applications that accord with Oxford's Local Plan (and, where relevant, with neighbourhood plans) 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 permission will be granted if benefits outweigh risks and if in accordance with the NPPF.</b>	The intention of this policy is to make it clear that there will generally be a positive attitude to development where it has positive benefits, is sustainable and complies with the development plan (or NPPF if there are not up-to-date policies). Being explicit about this sets a generally positive tone for the Plan.	This approach does not add anything beyond what is already set out in the NPPF and beyond what is expected.	Preferred Option



## 2.0 A healthy inclusive city to live in

### Introduction and wider context

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There are 3,100 households on the housing register.

The average house price (median) is £430,000 ([ONS – 2021](#)).

The median house price is just over 12 times more than the median salary in the city.

HMO data – 58,910 dwellings in city (ONS 2018) and HMOs represent 5,240 of these (2018 ONS local data)

49.3% privately rent as of 2020, an increase from 28% in 2001<sup>1</sup>

*Figure H1: Oxford's housing need information*

- 2.1 The limited supply of housing in the city has many negative impacts. This combined with the high and ever-increasing construction costs exacerbate inequalities by leading to high property prices and a limited supply of affordable housing. It can result in some residents being forced into overcrowded and unsuitable accommodation. Many are unable to access housing in the city, which for some, means moving out of the city and commuting in to work, which has associated environmental impacts and additional costs. For others, it means leaving the city altogether in search of a more affordable area to live and work. As such, some 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.

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<sup>1</sup> <https://www.oxford.gov.uk/propertylicensing> (Appendix 1 - Housing Stock Condition and Stressors Report)

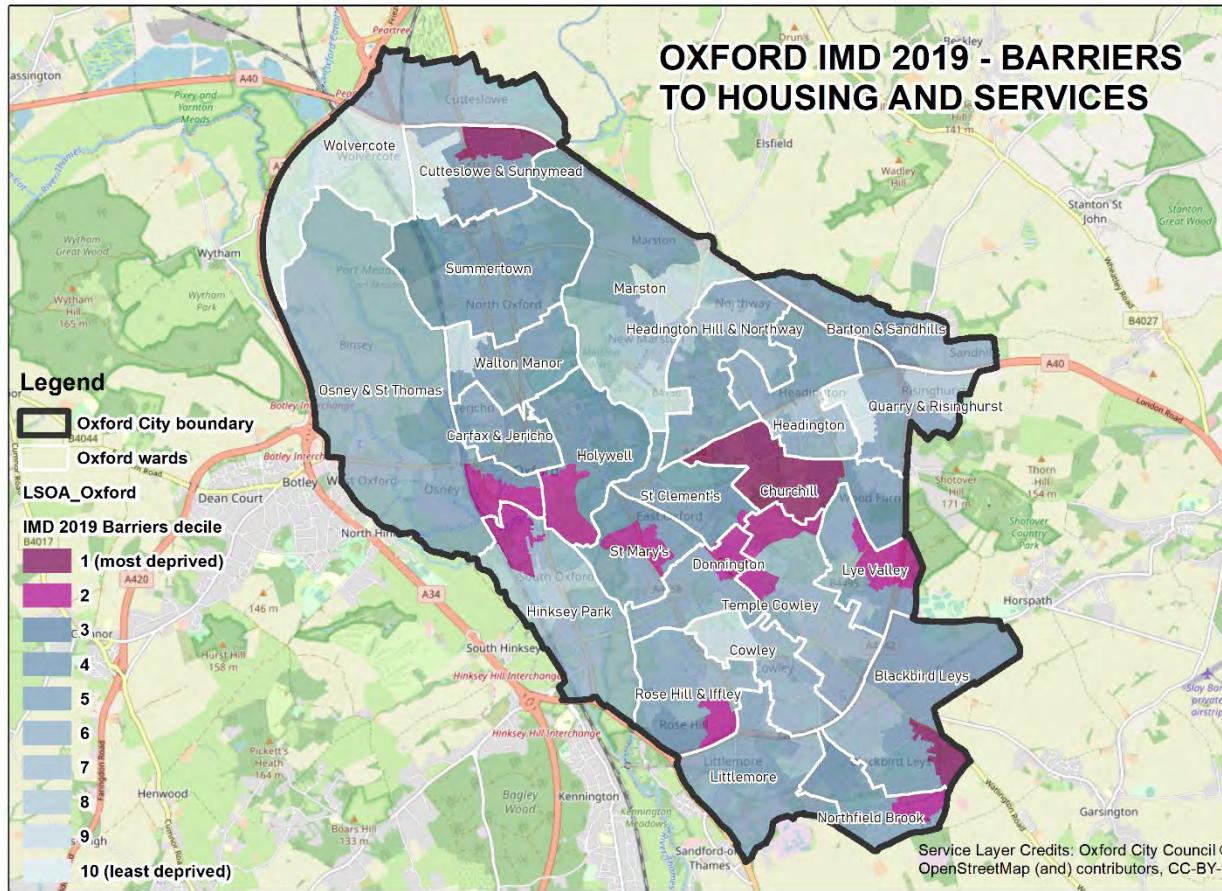


Figure H2: Index of deprivation barriers to housing and services, by Lower Super Output Area (LSOA)

- 2.2 The figure above shows that in 2019 (the most recent data), 11 of Oxford's LSOAs fall in the 20 per cent and 4 LSOAs in the 10 percent most deprived nationally for barriers to housing and services, and there are significant differences across the city. Addressing this housing crisis is a key priority for the Plan.

2.3 This chapter sets out options for the following housing policy areas:

- Housing requirement and housing need
- Delivering affordable homes
- Creating a mixed and balanced community
- Specialist housing needs

## The housing need and housing requirement

**Housing need** must be established and confirmed through the evidence base undertaken and planned for. We may not be able to meet all the housing need in Oxford so the calculated need won't necessarily be the housing target in the Plan- that is the **housing requirement**. To illustrate this, in the Oxford Local Plan 2036 the housing requirement over the plan period is 10,885 homes, with a housing need calculated of 15,000 (the neighbouring districts have allocations in their adopted local plans which will accommodate the unmet need – as set out in Figures D2 & D3 of Chapter 8 Development Sites, Areas of Focus and Infrastructure).

## Housing Requirement

2.4 The Local Plan must set out a total housing requirement for the plan period, setting out the number of houses that are required to be delivered each year. The Government checks delivery of housing in each planning authority in the Housing Delivery Test and there are sanctions if the requirement is not met.

## Housing Need

- 2.5 The minimum housing need figure for Oxford can be calculated by using the standard method as set out in national planning policy guidance paragraph 61 which states 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 guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”. We consider that circumstances are likely to exist in Oxfordshire that justify using an alternative method to calculate housing need, owing to its important role in the local and national economy.
- 2.6 The evidence base for calculating the housing need figure for Oxford to 2040 has yet to be calculated. The work was being undertaken as part of the Oxfordshire Plan 2050, but now the OP2050 is not proceeding, we will commission a piece of work to establish housing need, with a methodology agreed with as many of our neighboring districts as possible. However, what is known at the current time is that the capacity of Oxford to accommodate housing is lower than even the lowest possible housing need, which would be the figure determined by the Standard Method. It is considered there are reasons to diverge from the Standard Method in Oxfordshire (as discussed in relation to the options below). The housing need and the housing requirement set in the plan will differ because capacity is limited<sup>2</sup>, and the full need cannot be met. As Oxford cannot meet its housing need it should ideally be demonstrated how the need is being met outside of the authority's boundaries. This work would also have taken place as part of the Oxfordshire Plan process. However, in the absence of that, other means of joint discussion will be needed. Therefore, the housing needs evidence base, alongside a better indication of the magnitude of the unmet need, will form part of an additional consultation in 2023.

Policy Option Set H1: Housing requirement for the plan period				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Set a capacity-based/constraint-based housing requirement</b>	This requirement would be deliverable within the city (this is the only option that achieves this).	It will need to be shown that need is being met elsewhere if provision is not made for	Preferred Option

<sup>2</sup> An assessment of housing capacity in the HELAA indicates a capacity of c7852 dwellings

	<b>(c) 7852 dwellings over the Plan period 2020-2040).</b>	The principle has been tested at examination and found sound for LP2036, the Core Strategy and the 2016 Local Plan before that.	<p>the full need. A basis will still be needed for the need calculation, even if it is not meeting the requirement (see options below).</p> <p>If a capacity-based approach is taken for housing it will be harder to justify provision for other land uses in any quantity.</p>	
b	<b>Set a housing requirement in the Plan based on the identified housing need.</b>	The NPPF says that Local Plans should aim to meet identified need.	<p>Housing completions over the previous decade have averaged 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 to densities that negatively impact character and quality of life, for example by being very high and overshadowing and impacting on views.</p> <p>The focus on delivering this level of housing would significantly restrict the ability to bring forward other uses for which there is a significant need on the city and to protect important green spaces and local character.</p> <p>It would still not be practically possible to meet the need, meaning that the Plan could not be found sound as it would not be</p>	Alternative Option (considered detrimental)

		possible to demonstrate that the Housing Delivery Test Could be met.	
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#### Policy Option Set H2: Housing need for the plan period

	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
7	<b>a Define housing need based on the Standard Method calculation of need.</b> <b>(The level of need would be approximately 729 dwellings per annum)</b>	It is NPPF compliant to calculate the minimum housing need using the standard method and to attempt to meet that housing need in the Plan (the NPPF does also allow for other calculations of need, where justifying circumstances exist).	Circumstances exist in Oxford and Oxfordshire that justify alternative methods of calculating need. The standard need calculation does not take account of the strong economic growth in Oxfordshire, that, if not supported by housing, leads to greater problems of affordability, inaccessibility of housing and increased commuting.	Option
	<b>b Set a housing requirement based on the need calculated by seeking to achieve and support the economic growth, i.e. plan housing to support the forecast increase in workers. Set affordability-based target i.e., seek to meet full affordable housing need.</b>	With the Oxford Local Plan 2036 the Inspector agreed that circumstances existed to divert from the standard method and use an alternative means of calculating housing need, which for Oxford was based on meeting the significant affordable housing need. The Growth Deal existing to 2031 suggests it wouldn't be sound to use the Standard Method. The LIS is the adopted economic strategy for Oxfordshire. Oxford plays a key role in that strategy and Oxford's economy makes a considerable contribution to the regional	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. The LIS was undertaken before the pandemic, and the economic forecasts may need adjustments. Continued growth at this level would also benefit from continued infrastructure funding from	Option

	<p>and national GDP. Delivery of a level of housing to support economic growth is identified as a key element of the LIS ambitions and is part of the Oxfordshire Growth Deal until 2031. Affordable housing is a clear priority in Oxford. The level of affordable housing need is great and the standard method does not sufficiently help to delivering this need in full. Delivering sufficient affordable housing would make a significant difference to opportunities for Oxford's residents. Addressing inequalities is a priority and this can only be achieved by supporting the economy, including through delivery of sufficient housing, and provision of affordable housing.</p>	<p>Government, such as through the Growth Deal and HIF.</p>	
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## Delivering affordable homes

2.7 Oxford's need for affordable homes and the delivery of such homes is a key part of creating mixed and balanced communities, as such this remains a key priority for the City Council. Affordable housing is housing for sale or rent for those whose needs are not met by the market. The different types of affordable housing and tenure types include discounted rents and subsidised routes to buy. The provision of affordable housing on-site is important and preferred because it provides more certainty in helping to deliver mixed and balanced communities across Oxford. In addition, provision of on-site affordable housing by the developer helps to alleviate the challenge of finding other sites, which is very demanding when supply is so limited. When on site provision is not practicable then a financial contribution will be sought.

Viability testing will be undertaken to establish the threshold, the percentage of affordable housing and the mix of affordable housing tenures to be delivered on sites. However, the NPPF is clear that only sites of 10 or more units should be required to deliver affordable housing.

- 2.8 Affordable housing tenure types include:
- Social rent: the most affordable housing type. Rent set at a much lower rate than available on the open market (calculated using the Government's formula)
  - Affordable housing for rent: rent discounted to at least 20% below local market rents (not considered affordable in Oxford)
  - First Homes: discounted to no more than £250,000 (40% discount required in Oxford) and available to first-time buyers/households earning no more than £80,000
  - Other affordable routes to home ownership include shared ownership where a share of the homes is bought (using a mortgage) and the remainder is rented.
- 2.9 First Homes are a new form of affordable housing, introduced in a Ministerial Statement in May 2021, intended to help with home ownership. First Homes are offered for sale at a discounted rate but must meet certain criteria set out in national policy; as set out in national policy, a minimum of 25% of all affordable housing units secured using developer contributions should be First Homes. Where a development cannot provide affordable housing units on site, 25% of the financial contribution should be used to provide First Homes elsewhere. The First Homes requirement has only recently come into effect, so there is less evidence available to inform the delivery of this element. However, we are aware that there is strong risk that the First Homes delivered will be mostly one bed homes owing to the price cap and the values in Oxford, which have the potential to skew housing mix on sites and produce less one bed socially rented flats on a site, thus not meeting the housing needs of single people and couples that would require such accommodation.

<b>Policy Option Set H3: Affordable housing – Overall requirement</b>			
Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion

<b>a</b>	<p><b>Continue to prioritise the delivery of affordable housing requiring, dependent on viability, but for example as now, 50% of the overall housing requirement to be for affordable housing. Of the 50% affordable homes:</b>  <b>25% to be First Homes and 70% Social Rented and 5% intermediate (shared ownership being most likely).</b></p>	<p>Key element of creating and maintaining mixed and balanced communities.</p> <p>Prioritising Social Rent over intermediate forms of housing ensures that those in greatest housing need can access housing with rents set at local housing authority rents.</p> <p>(Note 25% First Homes is target set in national policy)</p> <p>50% affordable has been deliverable and viable in the city under the current local plan 2036 and the previous Core Strategy policies.</p>	<p>This approach has implications in terms of development viability particularly with the introduction of the First Homes requirement.</p> <p>Prioritising Social Rent over other intermediate housing can disadvantage those sectors of society who have a slightly higher household income and who would be further down the housing list, and yet for whom purchasing a property in Oxford is beyond their reach. Intermediate housing types such as Shared Ownership are very popular but would not come forward with this approach. The result is potential polarisation of the housing market where only those with high incomes and those in greatest housing need can afford to live in the city.</p>	Option
<b>b</b>	<p><b>Include a policy for affordable housing that does not require delivery of any First Homes e.g. 80% of affordable is Social Rented and 20% intermediate (such as Shared Ownership).</b></p>	<p>First Homes do not help those in greatest housing need; this approach would ensure we could continue to provide Social Rented homes, which are achievable for a wider range of people and help to reduce inequalities in access to decent homes.</p>	<p>First Homes are currently required in national policy. They may encourage those who work in Oxford but can't afford to buy here to remain in the city, reducing commuting, overcrowding and problems of a transient community.</p>	Option
<b>c</b>	<p><b>Seek to maximise the delivery of affordable housing overall, rather than maximising Social Rented- to be viable, this option will include a</b></p>	<p>This would lead to the delivery of the maximum number of affordable homes for those in the greatest housing need.</p>	<p>Increasing the % of affordable to above 50% to be delivered on sites could negatively impact upon viability and result in longer negotiations and delays to site delivery and</p>	Option (considered detrimental)

	<p><b>lower overall proportion Social Rented housing and a larger amount of intermediate housing such as shared ownership. For example 60% affordable housing overall with 50% social rented, 25% first homes and 25% intermediate housing, dependent on viability testing.</b></p>	<p>ultimately reduction of Social Rented provision to compensate/balance viability. There is no evidence that a higher rate is deliverable in the city.</p> <p>First Homes and Shared Ownership homes are not allocated to households on the Oxford Housing Register, and do not therefore directly meet the housing needs of the households most in housing need locally. They are not suitable for many households, including most homeless households or persons without, or with a poor credit or tenancy history. Reducing Social Rent will make meeting the housing needs of local income households more challenging.</p>		
d	<p><b>Focus on maximising the amount of Social Rented housing required, rather than focusing on the delivery of as much affordable housing of any kind as is viable. This may lead to a reduced proportion of affordable housing overall.</b></p>	<p>This option may result in delivering fewer than possible affordable homes, but the affordable homes delivered would be meeting the greatest housing need.</p>	<p>This would result in the delivery of fewer affordable houses. The level of affordable housing need would progressively worsen as the rate of supply would slow whilst the rate of demand would continue unchanged resulting in bigger affordability issues to be dealt with in future years. It does not help meet the needs of households that could afford shared ownership/ low-cost home ownership models.</p>	Option (considered detrimental)

e	<b>Do not maximise affordable housing requirements in terms of Social Rented or overall amount but set them at a level that leaves more profit for developers and more opportunity for wider developer contributions.</b>	This would allow for stringent requirements in other areas that cost developers money, for example carbon efficiency. The greater profit potentially available may encourage delivery of sites.	This approach would fail to maximise opportunities to address the housing crisis and it is not necessary in order to encourage sites. If careful viability work helps to demonstrate what can be realistically afforded whilst retaining a worthwhile profit.  There are severely limited site opportunities to spend developer contributions on.	Option (considered detrimental)
f	<b>Do not include a policy requiring affordable housing.</b>	This would remove any possibility of viability preventing sites coming forward and it would allow maximum requirements in other areas.	This would not be attempting to meet affordable housing needs, as is required by the NPPF, so would not be a sound approach. It would do nothing to address the housing crisis.	Option (considered detrimental)

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<b>Policy Option Set H4: Affordable housing: financial contributions for new student accommodation sites/campus and other non-self-contained or specialist housing</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Seek a financial contribution towards affordable housing to be delivered elsewhere in Oxford from development of student accommodation of</b>	In many situations, affordable housing would not be suitable to be provided on student sites, therefore a financial contribution is the preferred approach.	The seeking of financial contributions provides less certainty than developing on site affordable housing.	Preferred Option

	<b>25 or more rooms or 10 or more self-contained units.</b>	This provides an additional source of affordable housing contributions.	Would need to be tested through plan viability.	
<b>b</b>	<b>Require affordable housing to be delivered on-site within the scheme.</b>	Provides more certainty that affordable housing would be delivered.	Would place more burden on the universities and could undermine the provision of student accommodation to meet their needs and then restrict them being able to expand/redevelop their academic facilities.  In many situations, affordable housing would not be suitable to be provided on student sites. Or on sites delivering extra care or other specialist housing	Alternative Option
<b>c</b>	<b>Relax current policy and only require financial contributions from larger student schemes, for example of more than 50 rooms (or 20 self-contained units).</b>	Improved viability for student accommodation schemes, especially smaller schemes.	Result in a reduced financial contribution from what would be sought if the site was for general housing.  This could encourage landowners to opt for student accommodation in unsuitable locations instead of residential homes if the affordable housing requirement is less for these types of schemes.	Alternative Option (considered detrimental)
<b>d</b>	<b>Do not require a financial contribution from any student accommodation site.</b>	This may encourage more student housing to come forward which will release other housing stock for Oxford residents.	This would make the development of student accommodation disproportionately more attractive than the development of general housing which would result in sites suitable for housing being delivered just for student accommodation, this would make it hard to	Alternative Option (considered detrimental)

			deliver the objectives of the Plan. 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. This could impact on the overall provision of affordable housing in Oxford.	
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## Employer-linked affordable housing

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- 2.10 Employers in Oxford are facing significant challenges in recruiting and retaining staff as a result of the lack of availability and affordability of housing. This lack of accommodation is resulting in a recruitment crisis across a range of sectors. This policy option has been developed so that certain employers on named sites could contribute to addressing their own staff recruitment and retention issues by delivering homes for rent to their staff that is 100% affordable. It only applies to sites that would not contribute to general affordable housing needs, that would not otherwise come forward for housing development. It is anticipated these would be sites belonging the Oxford University and the Hospital Trust. There may be scope to widen this list if landowners come forward with an interest in delivering some employer linked affordable housing on their own land. Interested landowners can express feedback via this Preferred Options consultation.

Policy Option Set H5: Employer-linked affordable housing				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>On specified sites which would be listed in the Plan allow schemes that are available for employees who work for a specific organisation at a rent level affordable to them (as agreed with the local authority. Partial rent</b>	Provides mechanism for employers to actively help address affordable housing issues for employees, which in turn could help reduce pressure on the housing register.	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 does not undermine delivery of Social Rented housing, which meets the needs of those in greatest housing	Preferred Option

	<b>forms such as shared ownership may be possible if part remains in the ownership of the employer. Those on student placements may be considered employees).</b>	Could support wider objectives of the Plan such as decreasing need to travel. The option could help to bring forward sites which would not otherwise be available for residential uses (for example by being located on operational campuses).	need. It should be restricted only to sites unlikely to deliver affordable general needs housing to households in housing need.	
b	<b>Do not consider an employer linked housing policy.</b>	Removes any risk that delivery of Social Rented housing will be undermined.	<p>Landowners may be put off bringing forward certain sites, if not suitable for general residential schemes e.g. on sensitive sites like hospital sites where landowner may wish to only have staff living.</p> <p>Removing this policy could exclude an alternative potential supply of affordable housing or sterilise sites.</p>	Alternative Option

## Creating mixed and balanced communities

### Mix of dwelling sizes

- 2.11 It is important that a range of affordable housing types are available to meet the wide range of needs. The NPPF 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.

<b>Policy Option Set H6: Mix of housing sizes (no. bedrooms)</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
<b>a</b>	<b>Set a policy mix to ensure a range of sizes of unit for affordable housing (this would apply to all tenures except the market housing). This could be only on larger sites and outside of highest density areas. The mix could be defined by number of bedrooms or bedspaces. Flexibility to be part of the policy to ensure that the mix reflects the most up to date needs for the city following engagement with housing officers. (If the scheme is 100% affordable housing then the mix only applies to the proportion required to be affordable housing).</b>	It is important that there is a good 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.	Option
<b>b</b>	<b>Set a mix for both market and affordable homes and on a broader range of sites, for example all those over 10 units.</b>	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. A 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.	Option

c	<b>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. Also ask developers of all sites over 10 units to explain reasons for their choice of mix and to demonstrate how it delivers mixed and balanced communities which take account of the housing list and the context.</b>	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 with 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	<b>Focus on a mix of affordable housing unit sizes which is responsive to the housing list and therefore identified needs.</b>	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 (considered detrimental)
e	<b>Do not include a mix policy (for market or affordable homes).</b>	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	Option (considered detrimental)

			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.	
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## Development involving loss of family dwellings

2.12 Oxford can never meet its full housing need and as such it is important to ensure that the existing stock of homes is protected. This is particularly the case in order to protect the supply of family-sized homes (currently defined as 2+ bed houses and 3+ beds flats, although many 2 bed flats already house families and are adequate to do so) which are often under pressure to be subdivided into flats or converted into HMOs. The city is facing considerable pressure from the use of residential units as short term lets such as through Air BnB which are taking more properties away from the longer term private rented sector and or providing family homes.

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Policy Option Set H7: Loss of family dwellings options				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Resist a net loss of family dwellings except for specific reasons.</b>	Such specific reasons for an exception could include conversion to a nursery or primary care facility; therefore, introducing some flexibility would allow for the loss of dwellings to provide community facilities, or support/complement existing community uses in the area.	The loss of family dwellings undermines the benefits of building a mix of new homes which include homes suitable for families.	Preferred Option
b	<b>Resist the subdivision of family homes.</b>	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	Alternative Option

			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.	
c	<b>Resist the loss of family homes to short term lets such as Air Bed and Breakfast (Air BnB).</b>	Helps to maintain the existing supply of homes to ensure a varied supply of homes across the city.	It goes beyond the planning policies and more suited to being managed through licencing.	Alternative Option (considered detrimental)
d	<b>Have no restrictions on the loss of family dwellings.</b>	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 family housing would undermine the benefits of bringing forward the right mix of housing in new development to meet the population's current and future needs (objectively assessed need).	Alternative Option (considered detrimental)

## Houses of multiple occupation (HMOs)

- 2.13 A House in Multiple Occupation (HMO), in Oxford, is defined as a shared house occupied by three or more individuals, forming two or more households, as their only or main residence, who share amenities such as the kitchen and bathroom. According to OCC's recent 'Review of Licensing of HMOs (2020)' in 2018, just under 9% of all dwellings in the city (58,910) were HMOs<sup>6</sup> (5,240)<sup>7</sup>, indicating the important role they provide in meeting Oxford's housing needs. For many people, HMOs offer the only affordable solution as they are not able to rent individually or buy a property in the city. In some areas of the city the concentration of HMOs has resulted in changes to the character of the local area which has led to concerns across communities that the balance of households is dominated by HMOs. These shorter-term tenancies can result in a feeling of a transient population.

- 2.14 Purpose-built HMOs could help to reduce some of the potential management issues or neighbour conflicts because issues like car and cycle parking, bin storage can be fully addressed and incorporated into the design at the planning application stage rather than existing buildings having to be adapted or retrofitted.

<b>Policy Option Set H8: House of Multiple Occupation (HMOs)</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage (currently this is 20%).</b>	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.	Preferred Option
b	<b>Allow new purpose-built HMOs in appropriate locations.</b>	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 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.	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 intention that they will house students and act like student accommodation.	Alternative Option
c	<b>Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.</b>	This approach would acknowledge that the character of some areas is already to have more of a focus on shared housing for students and for young professionals particularly.	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.	Alternative Option (considered detrimental)

<b>d</b>	<b>Do not have any restriction on HMOs.</b>	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.	Alternative Option (considered detrimental)
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## Specialist housing need: university student accommodation

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- 2.15 The NPPF requires local planning authorities to plan for the needs of groups with specific housing requirements, including students. The Planning Practice Guidance states that 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 a campus. The PPG recognises that encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock.
- 2.16 The council recognises that some additional student accommodation should continue to be provided to meet the student accommodation needs of both universities. However, the options recognise that aiming to accommodate all students in purpose-built student accommodation could use up sites better suited to general housing and would undermine the desire to deliver mixed and balanced communities. The policy options set out a strategy for encouraging student accommodation development in the most suitable locations.

Policy Option Set H9: Location of new student accommodation				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion

<b>a</b>	<b>Restrict the locations where new student accommodation would be allowed to: existing 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.</b>	<p>This restricts student accommodation to the locations where it is most suitable both for the students and to avoid potential issues with unneighbourly behaviour.</p> <p>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.</p>	<p>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.</p>	Preferred Option
<b>b</b>	<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.</b>	<p>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.</p>	<p>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.</p>	Alternative Option
<b>c</b>	<b>Have no locational restriction on student accommodation but a criteria-based policy.</b>	<p>This would maximise the opportunity to meet student accommodation needs.</p>	<p>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.</p>	Alternative Option (considered detrimental)

<b>d</b>	<b>Allow new student accommodation only on existing campus sites and on existing student accommodation sites.</b>	This would significantly reduce competition between student accommodation and other housing types, maximising delivery of other housing types. It would limit feelings of disruption to communities of student accommodation that are sometimes reported.	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 in private rented accommodation, limiting its availability on the open market for others.	Alternative Option (considered detrimental)
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## Linking new academic facilities with the adequate provision of student accommodation

- 2.17 These options propose setting a threshold for the number of students living outside of university provided accommodation before additional academic facilities are permitted. This is a long-standing approach in Oxford to seek to balance the competing demands for sites and homes. The adopted policy which has been successful in ensuring that the universities continue to provide accommodation for most of their students as a core part of their wider development and estate strategies.

<b>Policy Option Set H10: Ensuring there is enough student accommodation to meet needs generated by new academic facilities</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
<b>a</b>	<b>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)</b>	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.	Preferred Option (in combination with b)

	<p><b>and the types of students it applies to (not all).</b></p> <p><b>The intention of the policy option is to see the student thresholds reducing in steps over the length of the local plan.</b></p>			
<b>b</b>	<p><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.</b></p> <p><b>Option B is linked to option A</b></p>	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.	Preferred Option (in combination with a)
<b>c</b>	<p><b>Have no policy linking new academic facilities to student accommodation</b></p>	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.	Alternative Option (considered detrimental)

<b>Policy Option Set H11: Managing new student accommodation</b>				
	<b>Option for policy approach</b>	<b>Potential positive consequences of the approach</b>	<b>Potential negative/neutral consequences of the approach</b>	<b>Related options, conclusion</b>
<b>a</b>	<p><b>Restrict occupation of new student accommodation to full time students enrolled in courses of one academic year or more</b></p>	Full time students who qualify for this accommodation will not be then renting houses in the general housing market	Part-time students are also likely to have housing requirements and may struggle to find alternative suitable accommodation.	Preferred Option (in combination with b)

	<b>(with potential to allow other occupiers outside of term-time if a management plan is agreed).</b>	thus releasing more of Oxford's housing stock for the non-student market. Policy flexibility for outside of term time maximise occupation of the developments.		
<b>b</b>	<b>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 residents from parking their cars anywhere on the site, (except for disabled residents).</b>	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.	Preferred Option (in combination with a)
<b>c</b>	<b>Do not have any management restrictions on new student accommodation.</b>	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.	Alternative Option (considered detrimental)

## Specialist housing for Gypsy and Travellers, Boat Dwellers and Older People

- 2.18 The NPPF requires local planning authorities 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. Travelling communities, boat dwellers and older people may all have specific accommodation needs. Evidence on

the quantity and type of need, was being gathered on an Oxfordshire-wide basis to support the Oxfordshire Plan 2050 and feed into Local Plans, however consideration will have to be given to how this work is now taken forward.

Policy Option Set H12: Gypsy and traveller accommodation				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Do not allocate sites but have a policy setting out criteria against which to assess any sites that do come forward.</b>	This approach would be flexible to respond to needs that may arise during the plan period, even if none currently identified.	It is important that criteria are aimed only at ensuring sites provide suitable living accommodation that does not conflict with other policies.	Preferred Option
b	<b>Search for sites to allocate to meet an identified need.</b>	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.	Alternative Option
c	<b>Do not allocate sites or set out policy criteria - default to national policy.</b>	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.	Alternative Option (considered detrimental)

2.19 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. Much of the boat-dwelling community relies on the existence of residential moorings which are defined as having planning permission for long-term mooring in a fixed location and for occupation as a household's sole or main residence.

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Policy Option Set H13: Residential moorings options				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Do not allocate sites for new moorings but have a policy setting out criteria to assess any sites that do come forward.</b>	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.	Preferred Option
b	<b>Search for a site to allocate for new moorings.</b>	If a site could be found this site would help to ensure identified needs are met. Current site allocation planning policy in Local Plan 2036 SP29 includes a proposal for some new residential moorings.	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.	Alternative Option
c	<b>Do not allocate sites or set out policy criteria.</b>		This would result in a lack of clarity and consistency of approach with no planning policy framework by which to assess planning applications.	Alternative Option (considered detrimental)

## Elderly Persons' Accommodation and other specialist housing needs

- 2.20 Older people are another identified group in the NPPF with specific housing requirements. Nationally, the population is ageing and whilst within Oxford the age profile of residents can appear to be hidden in the statistics for average age owing to the city's younger demographic, it is important to ensure that the needs of older people are considered. Further work needs to be undertaken to identify the level of need, but it is expected there will be a small need for elderly persons' extra care accommodation and other specialist housing, and this need will be for affordable extra care accommodation.

Policy Option Set H14: 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	Related options, conclusion
a	<b>Include a policy that is supportive of elderly persons' accommodation of all 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.</b>	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 and that they are not isolated and cut off from the wider community.	This approach will not necessarily lead to needs being met and may prevent some proposals coming forward.	Preferred Option
b	<b>Include a general policy that is supportive of specialist needs accommodation of all types but does not provide additional criteria on quality.</b>	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.	Alternative Option
c	<b>Require a proportion of the affordable housing on large sites to be used to meet specialist housing needs.</b>	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	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	Alternative Option

		help deliver mixed and balanced communities and meet the widest range of needs.	set at a level to meet all needs. It is important it does not over-burden developers and prevent sites coming forward. There is a critical mass of units that are viable to manage, meaning this approach is only likely to work on large sites, the type of which are not found in Oxford; therefore, this need, if identified, may be met on strategic sites just outside the city.	
d	<b>Include a policy that is restrictive of types of elderly persons' accommodation, private rented flats available to older people but with limited onsite support.</b>	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' 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.	Alternative Option (considered detrimental)
e	<b>Do not include a policy.</b>	This would allow the market to respond to need spontaneously.	This would not help to meet the needs of a specific group identified in the NPPF. It could give rise to a 'land take' of speculative care homes instead of using land for other housing to better meet local needs.	Alternative Option (considered detrimental)

## Self-build and custom housebuilding

- 2.21 Self-build and custom housebuilding is one of the elements of the government's approach to increasing housing supply and demand. Oxford City Council has a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in their area in order to build their own home. The requirements of the register are set out in the Self-

build and Custom Housebuilding (Register) Regulations 2016. This register informs the level of demand and in the current Oxford Local Plan has guided planning decision making.

Policy Option Set H15: Self-build and custom house building options				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Require a proportion of the total site area to be available as self-build plots on large sites with a number of proposed plots (for example of over 50 dwellings). If the plots are marketed and there is no sale of these plots after 12 months then dwellings should be built and brought forward in the usual way.</b>	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.	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 to really be tested so it could be that this does not meet needs or provides more 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.	Preferred Option
b	<b>Require a proportion of the overall number of units to be available as self-build plots for all sites over a smaller size, for example 10 units, with exceptions where this would not work (e.g. only flats, student accommodation).</b>	Gives 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 or 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.	Alternative Option

<b>c</b>	<b>Include a criteria-based policy which is positive towards but not requiring of self-build.</b>	Such a policy approach supports the delivery of other housing beyond self-build and community-led housing 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 for community-led housing schemes to come forward. This is not compliant with the Government's approach, which requires us to meet the need for self-build homes.	Alternative Option (considered detrimental)
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<b>Policy Option Set H16: Community-led housing</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
<b>a</b>	<b>Include a policy that is generally supportive of community-led housing but does not have any requirements.</b>	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.	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 to really be tested so it could be that this does not meet needs or provides more than the level of interest and creates delays in delivery. How affordable housing is calculated when there is a proportion of the plot rather than numbers required will need to be clear in the policy.  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.	Preferred Option

<b>b</b>	<p><b>Require a proportion of the total site area to be available to groups wishing to develop community-led housing (for example of over 50 dwellings).</b></p>	<p>Gives a greater opportunity for those of the self-build register, or community-led housing groups, to gain land to develop their own property.</p>	<p>More land given to community-led housing would result in less housing being delivered of other types and tenures.</p> <p>Very complex to achieve on small sites and could risk the viability of developments. Delivering this in combination with any requirement for self-build 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.</p>	Alternative Option
<b>c</b>	<p><b>Encourage delivery of community-led housing by relaxing some requirements of the Plan for this housing type, for example internal and/or external space standards.</b></p>	<p>This could encourage efficient use of land by sharing of facilities and could help encourage strong communities, with a range of housing opportunities for all stages of life.</p>	<p>Any standards introduced for internal or external space are in order to ensure a good living environment, and the justification for that would not change if there were some shared facilities nearby.</p>	Alternative Option
<b>d</b>	<p><b>Include a criteria-based policy which is positive towards but not requiring of community-led.</b></p>	<p>Such a policy approach supports the delivery of other housing beyond self-build and community-led housing which is where there is the greatest need.</p>	<p>Without a specific policy there is potentially limited scope for people to find self-build plots, or for community-led housing schemes to come forward. This is not compliant with the Government's approach, which requires us to meet the need for self-build homes.</p>	Alternative Option (considered detrimental)



### 3.0 A Prosperous city with a globally important role in learning, knowledge and innovation

#### Introduction and wider context

- 100
- 3.1 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. The presence of these organisations together in Oxford brings a number of benefits to the city's economy. Oxford is an attractive location for a range of companies and is in a position to 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 being closely located with one another. Work that's happening in Oxford is helping to find solutions to global problems such as the Covid pandemic and climate change. Oxford's economy makes a vital contribution to the regional and national economy and is important in contributing to economic recovery.
  - 3.2 The pandemic had an immediate impact on the way in which we work, with many office-based workers able to maintain productivity by working from home. However, this approach was not necessarily suitable for all sectors, including those working in life sciences, manufacturing, hospitality, tourism or other sectors where workers physically needed to go to a place of work. These sectors all need space to work, and it is important that that we look a number of approaches as to how best to manage delivery of employment space in the city.
  - 3.3 In spite of the increase in working from home, the office market has remained strong in Oxford; however traditional office professional service business occupiers are reducing their overall footprint requirements as companies adopt flexible working practices. Demand is led by research and development and lab spaces. This rapid take-up of research and development in Oxford, with a shift from offices towards spin-off research and development and life science companies, has meant that office space is being refurbished to research and development and wet lab spaces.
  - 3.4 Oxford is the most sustainable location for employment in the county and it is easier to build a sustainable transport system to take people to jobs here than if employment is scattered to less sustainable locations. This effect is increased with greater hybrid working as more occasional visits to workplaces are less able to be supported by public transport and a concentration of employment with other attractions helps overcome this issue.

3.5 The demand for employment space in Oxford remains very high. Oxford's key strengths are in research and development and there are benefits locally, regionally and nationally of encouraging this.

<b>Policy Option Set E1: Employment strategy</b>				
	<b>Option for policy approach</b>	<b>Potential positive consequences of the approach</b>	<b>Potential negative/neutral consequences of the approach</b>	<b>Related options, conclusion</b>
a	<p><b>Attempt to meet employment needs, but prioritise other uses, in particular housing, rather than employment, even if employment needs cannot be met in full within the city. This would mean making the best use of the city and district centres and existing prime employment sites, primarily through the delivery of continued employment uses at these locations. It could also mean allowing an element of housing to come forward on employment sites.</b></p> <p>(See options on “enabling housing on existing employment sites”; “making best use of employment sites”; and “location of new employment uses”, below.)</p>	<p>Whilst 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 focussing 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</p>	<p>This approach would mean some employment need would need to be met outside the city, and 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.</p>	Preferred Option

		allowing elements of existing employment sites to be converted to housing.		
b	<b>Allow growth of employment-generating uses throughout the city, including on sites not already in that use and outside of the city and district centres, to try to meet all forecast need within the city.</b>	Oxford's economy makes an important contribution locally, regionally and nationally, and this approach acknowledges that strength and focuses on it.	Currently, the demand for these uses seems to be particularly high and without being managed it is likely that schemes would come up across the city, at the expense of other uses, in particular housing. This would further worsen issues with in-commuting and unaffordability of housing, which does in turn affect employers.	Alternative Option
c	<b>Focus on Oxford providing a broad employment base, trying to protect a wide range of employment-generating uses including those that don't make efficient use of land. This would include protection of warehouse sites and small light-industrial sites, for example, as well as key sites such as the MINI plant and Science Area.</b>	This would allow a wide variety of entry points into the labour market, helping overcome issues with people being or feeling excluded from the Oxford labour market.	It is likely that many of the lower-value employment uses would not be able to afford to be in Oxford. Many may be better located on other parts of the trunk-road system and this approach would not prevent uses that generate a lot of traffic and HGV traffic coming near to where significant numbers of people live in close proximity.	Alternative Option

## Making best use of Employment Sites

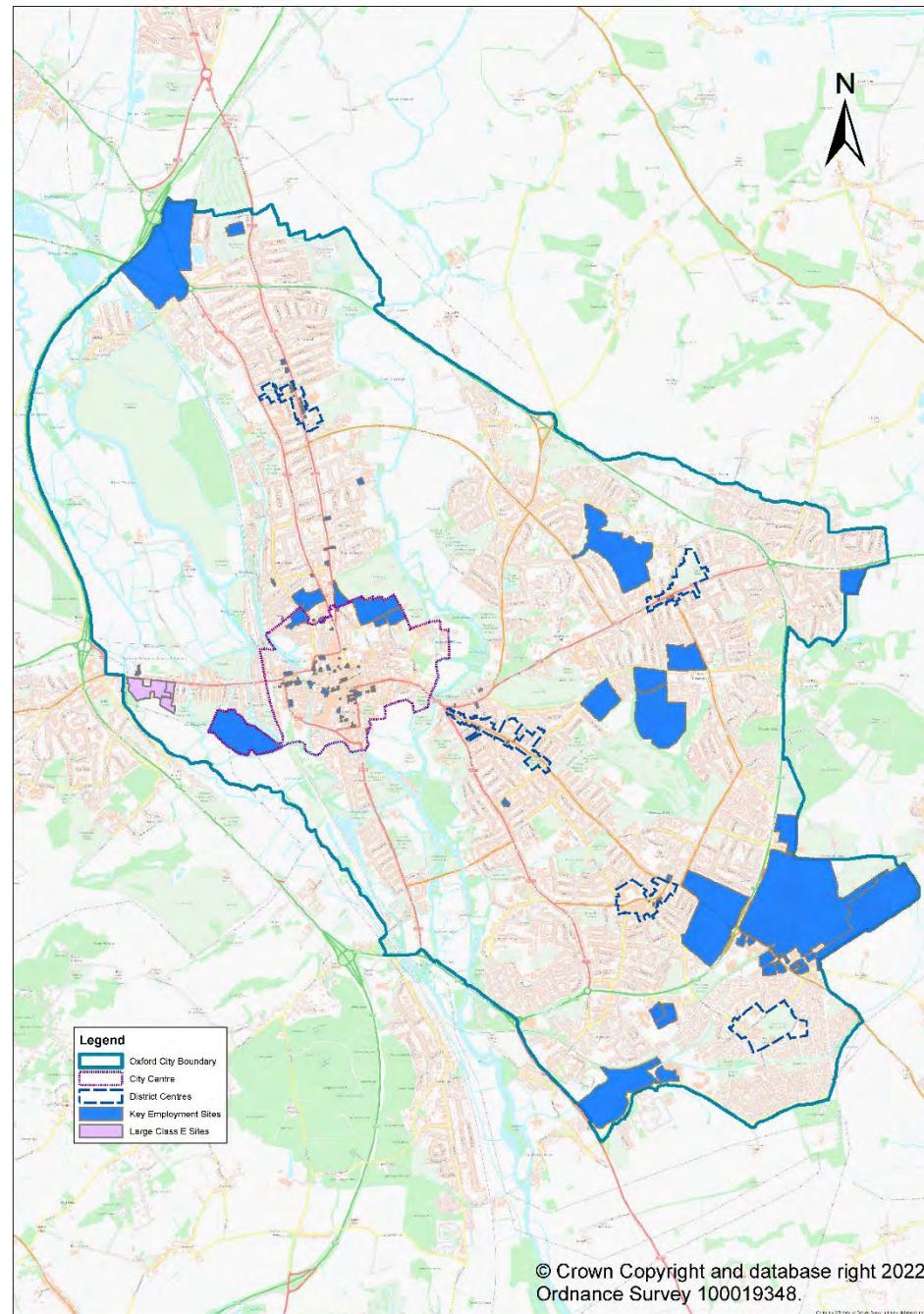
- 3.6 Traditionally, Oxford has needed to protect its employment sites to prevent losses to higher value uses, which in the past have often been residential in nature. More recently, higher value uses in the city are related to research and development and the importance of delivery of these uses has been prioritised nationally through incentives and linkages to increases in productivity. The preferred economic strategy encourages Oxford 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.
- 3.7 One of the guiding principles from the City Council's recently adopted Economic Strategy 2022-32 sets out the importance of increasing the local economic value of knowledge and innovation through retaining a greater proportion of spin-out companies that start up in the city. There is a need to focus on creating appropriate spaces to allow the effective start-up and expansion of these firms. Ultimately a proportion of these firms will ultimately locate elsewhere but by providing suitable spaces for these firms to grow and prosper, Oxford maintains its role as an engine for the wider economy to thrive.
- 3.8 Changes to the Use Classes Order mean that what were previously Class B1 uses, (offices, research and development and light industrial uses) now form part of Use Class E. Use Class E – Commercial, Business and Services now covers a much broader range of what can be described as 'town centre uses' including shops, banks, restaurants and clinics. Planning permission is not required to change between any Use Class E use unless an alteration is made to the building. It is worth noting that use classes B2 and B8 were not impacted by these changes. This increases the flexibility of uses that can be provided on allocated employment sites where that employment is now in Use Class E. Protection of employment sites (in Use Class E that are important for the local economy) is weakened by these changes. It also means that in developing any policy directing where new employment uses can go, consideration needs to be given to the alternative uses that these can change into, and the suitability of the sites for these uses.
- 3.9 Some well-performing employment sites that support the city's local economy (which often include a mix of Class E and B2 employment uses) may come under pressure for redevelopment to higher value employment uses. Given the permissive changes within Use Class E of the Use Classes Order, there is likely to 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).
- 3.10 There are also employment sites which may be poorly located or not performing well. Clearly, if another legally compatible use is sought on such a site there is a limited amount that the planning system can do to prevent that use coming forward. However, the City Council would support the complete loss of these poorly performing employment sites to other priority uses (e.g., housing). There are a number of areas of the city where these innovations and important sectors are being

encouraged. They include, Oxfords' West End Innovation District, as well as the Oxford Science Park, Business Park, Old Road Campus, the Hospital sites, Oxford Science Area, and Keble Road, the Radcliffe Observatory Quarter and Oxford North will be an important site for research and development and science-based uses. All these sites play an important role individually, and collectively the contribute to economic growth nationally, regionally and to the local economy.

- 3.11 Manufacturing plays an important role in the economy too. Oxford sits at the centre of a £6bn automotive cluster, dubbed 'Motorsport Valley' and BMW Mini are a major industrial employer in the city. MINI Plant Oxford accounts for nearly half of all industrial space city-wide<sup>1</sup>. Retail and 'third sector' jobs in the Oxford also make an important contribution to the economy.
- 3.12 Economic diversity can provide a more stable path to equitable growth and development. In this way, the protection of Oxford's economic assets needs to enable both appropriately located high value economic uses which benefit the national and even the global economy, but also to protect those uses which are vital to Oxfords' local economy.

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<sup>1</sup> [https://www.oxford.gov.uk/info/20238/oxfords\\_economy/945/oxfords\\_business\\_sectors/5](https://www.oxford.gov.uk/info/20238/oxfords_economy/945/oxfords_business_sectors/5)



*Figure E1: Local Plan 2036 Protected Employment sites*

- 3.13 The changes to the Use Classes Order mean that, even on sites protected for employment-generating uses, offices may change freely to any other commercial use.

<b>Policy Option Set E2: Making Best Use of Existing Employment Sites</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<p><b>Seek to meet employment needs on Category 1 and 2 sites, which are named in the plan (and may be Use Class E or B2), by intensification, modernisation and regeneration of these sites.</b></p> <p><b>Where Category 3 sites become available for redevelopment, their complete loss to housing should be considered acceptable providing account is taken of certain specified objectives.</b></p>	<p>Continued focus of protection for employment sites that align with Oxford's key strengths and for those which assist the local economy.</p> <p>Has the potential to deliver sustainable transport solutions as intensification opportunities at existing sites are in known locations.</p> <p>Allows some sites to be redeveloped for housing.</p>	<p>Widening of scope of use classes order (Class E) to allow changes of uses without planning permission has the potential to diversify employment sites which means that such controls will be less effective.</p> <p>Class E of the Use Classes Order also has the potential to deliver a range of town centre uses on Cat 3 employment sites without the need for planning permission.</p>	Preferred Option
b	<p><b>Do not support the loss of any employment uses (Use Class E or B2) on any categorised employment site, including Category 3 sites, and encourage intensification, modernisation and regeneration of these existing employment sites.</b></p>	<p>Likely to further support economic objectives for the plan and could encourage a range of employment opportunities.</p>	<p>Increasing the scope of protection to include category 3 employment sites could result in employment opportunities coming forward outside of sustainable locations.</p> <p>As above in relation to permitted development opportunities afforded by</p>	Alternative Option

			<p>changes to the Use Classes Order (Class E).</p> <p>Would protect employment sites at all costs against other uses, loss of potential sites for other uses.</p>	
c	<p><b>Do not categorise sites. Instead, provide protection by use class, focusing on providing protection for locally important (Use Class B2 (manufacturing)) employment sites to ensure a broad economy. Do not try to prevent loss of Use Class E (office and light industrial, also including retail) (except in district centres for frontage policy C2), acknowledging that Class E use is very broad and can change to residential use with prior approval anyway.</b></p>	<p>This would help keep a broad employment base by attempting to keep manufacturing site in that use. This acknowledges that Use Class E sites can potentially be lost to residential through the prior approval process, and that not all are in what would be considered the most sustainable locations for those uses.</p>	<p>Not all sites in B2 use will be in suitable locations or making the most efficient use of land. Some may benefit from a change of use or addition of other uses. This approach does nothing to support the presence in Oxford of significant research and development sites where work is carried out looking for solutions to global problems such as the climate emergency and pandemics.</p>	Alternative Option
d	<p><b>Rely solely on national policy and other policies within the plan.</b></p>	<p>Would allow flexibility to respond to market conditions.</p> <p>This option would likely benefit higher value uses such as R&amp;D.</p>	<p>This option would not actively protect employment sites and would let the market decide on the most appropriate employment opportunities in the city. This would lead to uncertainty and an inability to plan for meeting the employment needs of the city.</p>	Alternative Option (considered detrimental)

			Important sites that contribute to Oxford's local economy could be lost to other uses.	
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Policy Option Set E3: Allowing housing on existing employment sites				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Allow an element of housing delivery on existing employment sites (if other policy requirements, for example around flood risk, are met).</b>	Locating housing close to jobs can bring benefits for local services and facilities and can mean that more of Oxford's housing need can be met within its boundary. This may help to meet Oxford's housing need and provides flexibility if circumstances and values change over time, even if owners and developers are not interested in introducing housing to their sites currently.	<p>It will be important to ensure that any new housing allowed on existing employment sites is done so while ensuring that the potential number of jobs exported out of the city is not increased.</p> <p>Even if the policy approach is taken forward, it may not initially deliver results due to higher land values currently commanded by certain employment uses.</p> <p>Oxford's economy is locally, regionally and nationally important and this approach could damage its functioning and contributions. Important employment sites include, for example, the Old Road Campus where important</p>	Preferred Option

			research takes place, and the hospitals which are important for health care treatment research, and these should be supported, not lost. Likely to result in a loss of locally specific employment opportunities to higher value uses, including high-value employment and other commercial uses. Narrowing the spread of employment opportunities in the city.	
b	<b>Maintain employment sites for employment or commercial uses. Do not further diversify uses to include housing as well.</b>	Oxford is unable to meet all its employment needs and as such it is important to ensure that existing employment sites are protected for those uses and not diversified for other uses.	Important employment sites are unlikely to be lost to housing development as they are not always appropriate locations for housing development for example BMW sites. However, some sites are suitable such as the hospital sites which already have housing for their own staff. By allowing housing on sites like this it enables key employers to recruit and retain staff which is so challenging when housing affordability is such a huge challenge to staff particularly those on lower pay grades who cannot afford to live in the city.	Alternative Option

## Location of New Employment Uses

- 3.14 The location of new employment uses at existing employment sites, through intensification and modernisation opportunities, is an important way of ensuring that Oxford city attempts to meet employment needs without using additional land in the city which could be used for other priority uses (including housing). There are a number of benefits to intensifying and modernising existing sites, which include infrastructure improvements (e.g., sustainable transport solutions), efficient use of land, and clustering benefits of locating new employment uses close to one another.
- 3.15 Certain employment uses (offices, light industrial) that now fall within Use Class E of the Use Classes Order and as such do not need planning permission to change to and from uses within the same use class. The city and district centres are sustainable locations for town centre uses (as defined in national policy), which includes, Use Class E office uses. New employment uses could also occur where there is an existing lawful employment use without the need for planning permission. However, outside of the sustainable locations of the city and district centres, and outside of sites already in lawful use, it is possible to prevent loss of other uses, which are also important, particularly housing, to employment uses.

Policy Option Set E4: Location of new employment uses				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Support new employment uses through intensification and modernisation of existing sites, including hospitals and universities, other Category 1 and 2 employment sites (E.g., supporting office and R&amp;D in Oxford's West End and recognising innovation clusters such as the Business Park, Science Park Oxford North and Old Road Campus), together with the City and District Centres (subject to the role and function of each respective centre).</b>	<p>Would retain geographic focus of employment uses in existing centres and employment locations.</p> <p>This may provide capacity for much of the employment space needed without requiring additional land which could be used for other purposes.</p> <p>Intensification and modernisation of existing Category 1 and 2 sites could bring connectivity and infrastructure benefits. By considering the city's</p>	<p>This approach encourages continuation of employment uses in their existing locations, which may not be the most ideal locations (for example the Science Park is not as easily accessible as a district centre location).</p> <p>Focusing strongly on a few specific locations risks localised issues around transport impacts and neighbourliness or may not address existing issues.</p>	Preferred Option (in combination with b)

Policy Option Set E4: Location of new employment uses				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
		<p>employment areas spatially, it provides opportunity for linkages between sites which can bring integrated infrastructure benefits, e.g., sustainable movement opportunities.</p> <p>The creation of a spatial dimension to Oxford's economic assets is likely to assist with integrated infrastructure delivery (e.g. improved movement opportunities for between sites) as well as helping Oxford build on its economic strengths. Benefits to the city's economy due to maintaining good links between hospitals, teaching and research.</p> <p>Seeks to intensify and redevelop existing sites which is likely to result in more efficient use of land.</p>	<p>The changes in Use Classes Order (to include certain employment uses within a wider bracket of town centre uses), means this approach may have limited value other than encouraging or supporting new employment or intensification opportunities in employment locations.</p>	
<b>b</b>	<b>Do not allow any new employment-generating uses outside of existing sites (i.e., do not allow loss of existing housing sites outside of city and district centres to employment-generating uses).</b>	This would likely lead to more employment sites coming forward for alternative uses, which could be beneficial for meeting those needs but detrimental in terms of meeting the economic needs of the city and	Restricting the number of employment sites would likely tilt the market further in favour of high value employment uses and lower value (but still valued) employment uses may miss out without specific policy provision (see affordable workspaces option below).	Preferred Option (in combination with a)

<b>Policy Option Set E4: Location of new employment uses</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
		providing a broad range of jobs and opportunities.		
c	<b>As well as intensification on existing sites and in the city centre and district centres, allow new employment uses in a very few locations specified as suitable, which would be only adjacent to existing sites, potentially requiring this expansion to be part of mixed-use schemes only.</b>	This approach would help to strengthen clusters and allow Oxford to build on its strengths. Allowing extensions to existing employment sites may be an appropriate use of land if their location supports a good mix of uses, but opportunities must be taken to meet housing needs also. This would be in limited locations if it could be shown as necessary to meet needs.	Actively supporting the creation of additional centres or extensions to existing sites could have potential negative impacts on the delivery of other uses including housing and much-needed affordable housing in the city.	Alternative Option
d	<b>Rely solely on national policy and other policies within the plan (e.g., hierarchy of centres) to determine proposals for new employment floorspace in the city.</b>	The market is likely to favour higher value uses such as R&D which are an important sector.	The plan would be silent on considerations for proposals outside of existing sites. This would not provide any policy guidance on where new employment uses should be considered. Offices would be covered by any requirement for town centre uses to be in the city and district centres, but other employment uses would not have any guidance.	Alternative Option (considered detrimental)



## Warehousing and storage (B8 Uses)

- 3.16 These uses do not generally make intensive use of land and given the various competing demands on land in Oxford and the need to make efficient use of it, they are not always the most appropriate use within the city. For this reason, the current policy approach sets out that new B8 uses are only considered appropriate where the B8 use is essential to supporting the operational requirements of a Category 1 site, whereas the loss of B8 on any employment site is supported providing the B8 use is not essential to the support of a Category 1 employment site.
- 3.17 One key aim of the Local Plan 2040 is to support Oxford's transition to a zero-carbon future. The Zero Carbon Oxford Partnership has produced a roadmap and action plan highlighting a number of important actions to help deliver a successful transition to Zero Carbon living by 2040 and as such action is to pilot "a number of freight consolidation centres around the edge of Oxford". It is important that the Local Plan 2040 policy approach does not prevent this from taking place as it is most likely that these sites suitable for B8 uses could be considered as a suitable location for such centres.

Policy Option Set E5: Warehousing and storage uses

	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>New B8 uses on sites not already in the lawful use only allowed where use is essential to the operation of a Category 1 site.</b>  <b>Loss of B8 uses generally supported unless B8 use is essential for the support of a Category 1 site.</b>	Prioritise land for more efficient and intensive employment generating uses.  Exception would enable the continued or enhanced operation of Category 1 sites where appropriate.	Without option b, this approach regarding location would not fully support ZCOP Action Plan ambitions.	Preferred Option (in combination with b)
b	<b>Introduce a specific exemption to option a to enable a pilot of a</b>	This would enable LGV/ HGV freight to be moved to electric delivery vehicles,	Any relaxation would need to be carefully managed to ensure it does not	Preferred Option (in combination with a)

**Policy Option Set E5: Warehousing and storage uses**

	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
	<b>freight consolidation centre around the edge of Oxford.</b>	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.	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.	
c	<b>Further restrict creation of new B8 uses so they are generally not supported at all.</b>	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 category 1 sites that rely on some B8 for their continued operation.	Alternative Option
d	<b>Allow B8 uses on other categories of employment sites in the city.</b>	Could increase B8 uses on a range of sites in the city, providing services and a broader variety of jobs.	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.	Alternative Option

Policy Option Set E5: Warehousing and storage uses				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
e	<b>Rely solely on national policy and other policies within the plan.</b>	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.	Alternative Option (considered detrimental)

## Inclusive Economy

- 3.18 One of the City Council's four priorities is to enable an inclusive economy<sup>2</sup>. There are many different factors that help support an "inclusive economy". The Local Plan can support this ambition by helping to deliver different types of employment space to support a more diverse economy. It could make (such as making provision for affordable workspaces); and encouraging investment in new skills and apprenticeships (e.g. through community employment plans).

## Community Employment Plans

- 3.19 Employment and Skills Plans/Community Employment Plans 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.

Policy Option Set E6: Employment and Skills Plans				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Introduce a policy requiring applicants to submit an Employment and Skills Plan alongside major development proposals, which also looks at the potential for engagement with training and education.</b>	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.	Preferred Option

<sup>2</sup> Oxford City Council, Our Strategy 2020-24 [https://www.oxford.gov.uk/info/20328/our\\_strategy\\_2020-24](https://www.oxford.gov.uk/info/20328/our_strategy_2020-24)

Policy Option Set E6: Employment and Skills Plans				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
<b>b</b>	<b>Encourage applicants to submit an Employment and Skills Plan alongside all major development proposals but don't make this a policy requirement.</b>	A voluntary approach would be flexible but applicants could still be encouraged to embark on ESP's 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.	Alternative Option
<b>c</b>	<b>Do not encourage or require applicants to submit an Employment and Skills Plan.</b>	Increased flexibility for applicants.	Removing encouragement from supporting text of plan may actively discourage applicants to submit Employment and Skills Plans.	Alternative Option (considered detrimental)

## Affordable Workspaces

- 3.20 The recently published Oxford Economic Strategy 2022-32 highlights the importance of affordable workspaces that support creative activity, social enterprise and co-operative businesses and local start-up as one of its guiding principles for an inclusive city. This would provide a more diverse employment base and give opportunities for these sectors to develop and grow. To foster this success and ensure it is widespread and lasting, affordable workspaces could be provided at rents maintained below the market rent. This would help a broader range of businesses locate in the city who may otherwise be forced out or unable to operate.
- 3.21 The Economic Strategy (June 2022) emphasises the importance of Oxford building on its economic strengths in key sectors such as research and development and life sciences. The close links between the universities, hospitals and businesses play an important role in bringing forward developments in life sciences and research and development, for example. It is important that Oxford focuses on its economic strengths but also important to maintain some diversity in the

economy as this can not only enable positive economic growth and development but also, according to the World Trade Organisation<sup>3</sup>, can provide a more stable path for equitable growth and development.

- 3.22 While retaining a greater proportion of higher value spin-out and start-ups helps Oxford to build on its strengths, the City Council's Economic Strategy also highlights the importance of providing more affordable workspaces for small businesses to support creative activity, social enterprise, co-operative businesses and local start-ups in the city. Providing affordable workspaces for these types of businesses is likely to help diversify the city's economy which can help to bring more equitable growth and prosperity to the city. The affordable workspace secured should be provided on-site and be designed to meet a local need for office, light industrial or research and development workspace. There may be different routes to how it is made available. It will be important to have some management of which businesses take up the space, to ensure it does meet the identified needs and objectives, an option may be for the City Council to manage an approved list of affordable workspace providers who will lease and manage it.

<b>Policy Option Set E7: Affordable Workspaces</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Introduce a policy requirement for affordable workspaces to be delivered as a percentage of all large commercial development in Class E (threshold to be set, but this will be large schemes, likely above the minimum size of major applications).</b>	Likely to be the approach which would secure the most affordable workspace and help facilitate an inclusive and diverse economy.	A new policy approach would need rigorous testing and may be considered onerous.  This approach will need a clear mechanism and viability evidence will be needed to inform any policy requirements.	Option
b	<b>Introduce text in the local plan encouraging employers to deliver affordable workspace in the city.</b>	Maintains a flexible approach for developers.	No policy requirement would likely deliver affordable workspaces only where there is a strong commitment or desire from landowners/ developers.	Option

<sup>3</sup> [https://www.wto.org/english/res\\_e/booksp\\_e/aid4trade19\\_chap5\\_e.pdf](https://www.wto.org/english/res_e/booksp_e/aid4trade19_chap5_e.pdf)

Policy Option Set E7: Affordable Workspaces				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
c	<b>Do not incorporate the concept of affordable workspace in the Local Plan.</b>	Leaves the market to determine what type of employment space is provided.	This could be a missed opportunity to address the issue of unaffordable workspaces in the city and therefore to help secure an inclusive economy.	Option

## Tourism

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- 3.23 Tourism plays an important role in Oxford's economy. According to the Experience Oxfordshire, in 2019, tourism generated around £988m for the city's economy from 7.8m visitors to the city, of which just over 84% were day visitors. Before the pandemic, Oxford had a strong tourism sector with 14% of all the jobs in the city being tourism-related in 2019, when there were around 7.8 million visitors to the city. The tourism sector (and hospitality) was impacted by the pandemic; however, we have not yet had a full year of "being open" and neither have some of the countries from where visitors originate. It is expected, over the lifetime of the plan, that the tourism sector will recover and return to pre-pandemic levels. It will be important to support the recovery of sectors such as these which are important to the vitality and function of a city such as Oxford.
- 3.24 Oxford has many short-stay visitors, often visiting for a day or only a few hours, which has fewer benefits for the local economy. Tourists and visitors help support facilities and attractions such as theatres, cinemas and the ice rink. Visitors can also help support local restaurants, cafes, etc., which is beneficial to residents who can enjoy a greater range of facilities. Tourists who stay longer are likely to bring more to the local economy, but to enable that requires more provision of tourist accommodation. New hotels must not harm amenity of local residents or generate car traffic. Many tourists travel by coach and managing the impacts of coaches in a compact city is challenging.

### Short-stay accommodation (hotels and guest-houses)

<b>Policy Option Set E8: Short-stay accommodation (hotels and guest-houses) (New Accommodation)</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
<b>a</b>	<b>Allow new sites for holiday and other short-stay accommodation in the city and district centres, on allocated sites and on Oxford's main arterial roads only.</b>	<p>Approach would continue to encourage new short-stay accommodation in sustainable and accessible locations.</p> <p>Likely to benefit Oxford's economy through supporting a higher percentage of Oxford's visitors to stay overnight.</p> <p>Potential to enhance the vibrancy of the city and district centres by allowing tourist accommodation to be located here.</p>	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>b</b>	<b>Allow new short-stay accommodation in the city and district centres, and on allocated sites only.</b>	<p>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.</p> <p>Potential to enhance the vibrancy of the city and district centres by allowing tourist accommodation to be located here.</p>	<p>May increase pressure for town centre uses in city and district centres and reduce variety of uses in these locations.</p> <p>Would reduce the number of locations where tourist accommodation is deemed appropriate, and it may not be possible to meet needs.</p>	Option

<b>Policy Option Set E8: Short-stay accommodation (hotels and guest-houses) (New Accommodation)</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
c	<b>Support new short-stay accommodation anywhere in Oxford.</b>	Would increase the amount of 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 Oxford's 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 would have been appropriate.	Option (considered detrimental)
d	<b>Seek to resist new short-stay accommodation anywhere in the city.</b>	This option would likely enable more sites to be developed to enable delivery of other priorities for Oxford (e.g. housing and employment).	Likely to encourage more tourists to only opt to visit Oxford for the day rather than encouraging more overnight stays and increasing visitors to Oxford. Potential harm to Oxford's economy and likely to hamper Oxford's long-term tourism objectives.	Option (considered detrimental)
e	<b>Do not include a policy on new short-stay accommodation in the city.</b>	Reliant on other policies to bring about positive impacts for development of new tourist attractions.	Reliant on other policies to mitigate any potential negative impacts on transport, heritage, and wider environment.	Option (considered detrimental)

### Short-stay accommodation (hotels and guest-houses) (Existing Accommodation)

<b>Policy Option Set E9: Short-stay accommodation (hotels and guest-houses) (Existing Accommodation)</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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.</b>	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 and may not effectively promote Oxford's tourism objective of encouraging overnight visitation.	Preferred Option
b	<b>Continue to seek to allow expansion of existing short-stay accommodation providing certain criteria are met.</b>  <b>Continue to seek to protect existing accommodation and allow loss only if specified criteria are met including either viability evidence or if the location is not one where new short stay accommodation would be allowed.</b>	<p>Likely to provide support for Oxford's tourism economy by protecting existing facilities and allowing their expansion.</p> <p>It is important to seek to prevent the loss of existing visitor accommodation to other uses because tourism is an important contributor to Oxford's day and evening economy.</p>	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.	Alternative Option

## 4.0 A green, biodiverse city that is resilient to climate change

### Introduction and wider context

- 4.1 The primary theme of the vision for Oxford in 2040 addressing the environmental pillar of sustainability, ensuring that Oxford is a green and biodiverse city that is resilient to climate change, is underpinned by five specific objectives:
- Supporting strong, well-connected ecological networks and securing net gains in biodiversity.
  - Ensuring the city is resilient and able to adapt to the impacts of climate change.
  - A city that is resilient and resistant to flood risk and its impacts on people and property.
  - A city with a green/blue network that is protected and enhanced.
  - Accessible open spaces for all with opportunities for sport, food growing, recreation, relaxation and socialising
- 124 4.2 Success in addressing this theme will mean that we are better addressing existing inequalities in health and wellbeing of the city's residents, as well as the national problem of biodiversity decline and ensuring that we leave our environment in a better state in 2040 than it is today. Equally, it is a key aspect in addressing the ongoing challenge of climate change, in particular, the need to adapt to the impacts of the changing climate and to build resilience across the city so that we are better able to withstand its effects, such as overheating, flooding and drought.
- 4.3 This chapter sets out a range of options for policy falling under several sub-topics related to this theme, which are:
- Green and blue infrastructure
  - Ecology and biodiversity
  - Climate resilience (encompassing flood risk and drainage)

### Green and blue infrastructure

### **Green infrastructure**

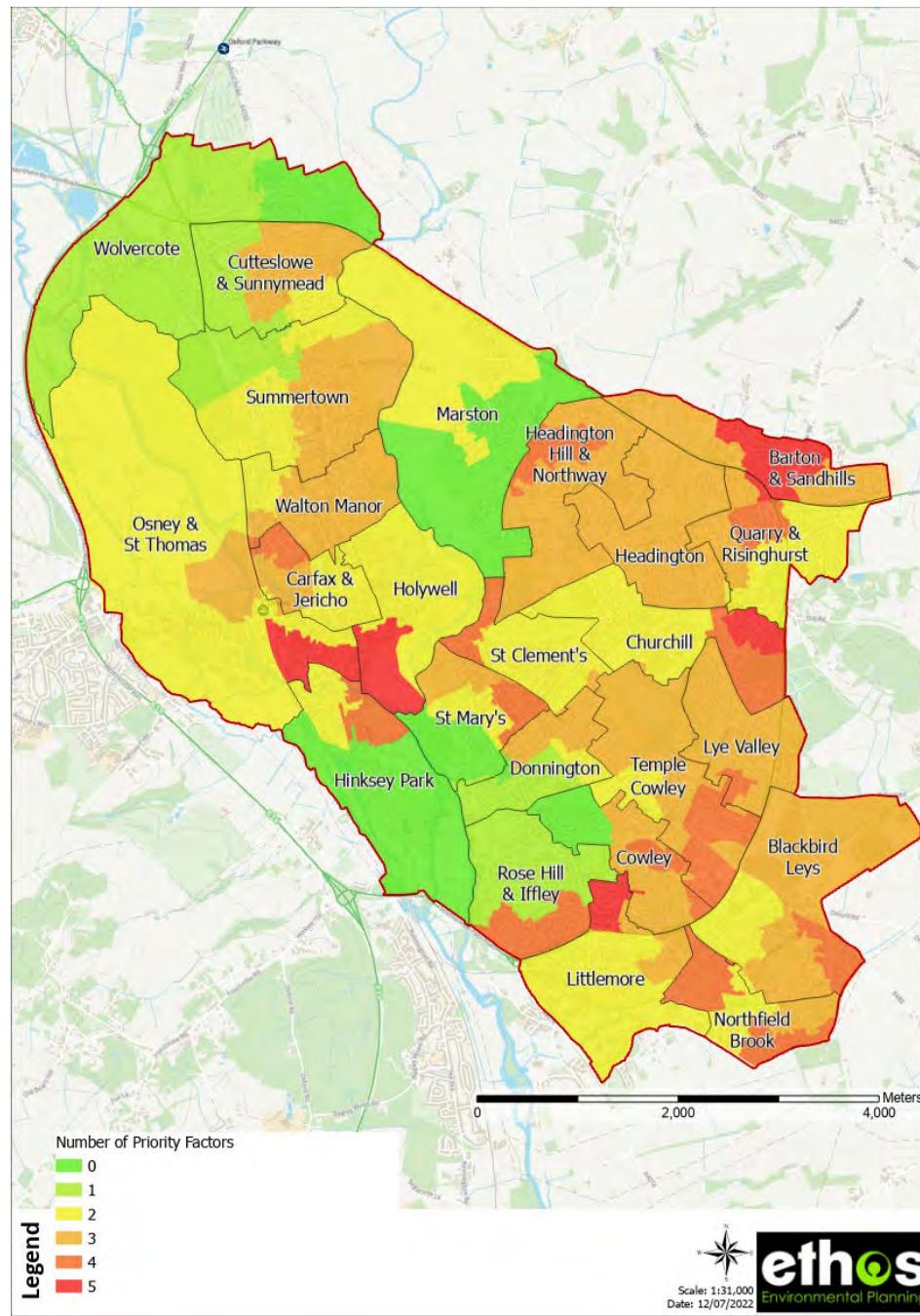
A range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and ‘blue infrastructure’ such as streams, ponds, canals and other water bodies (*Planning Practice Guidance, 2019*).

### **Ecosystem services**

The range of benefits derived from the natural environment and its ecosystems such as enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes, food and energy production, urban cooling, and the management of flood risk (*Planning Practice Guidance, 2019*).

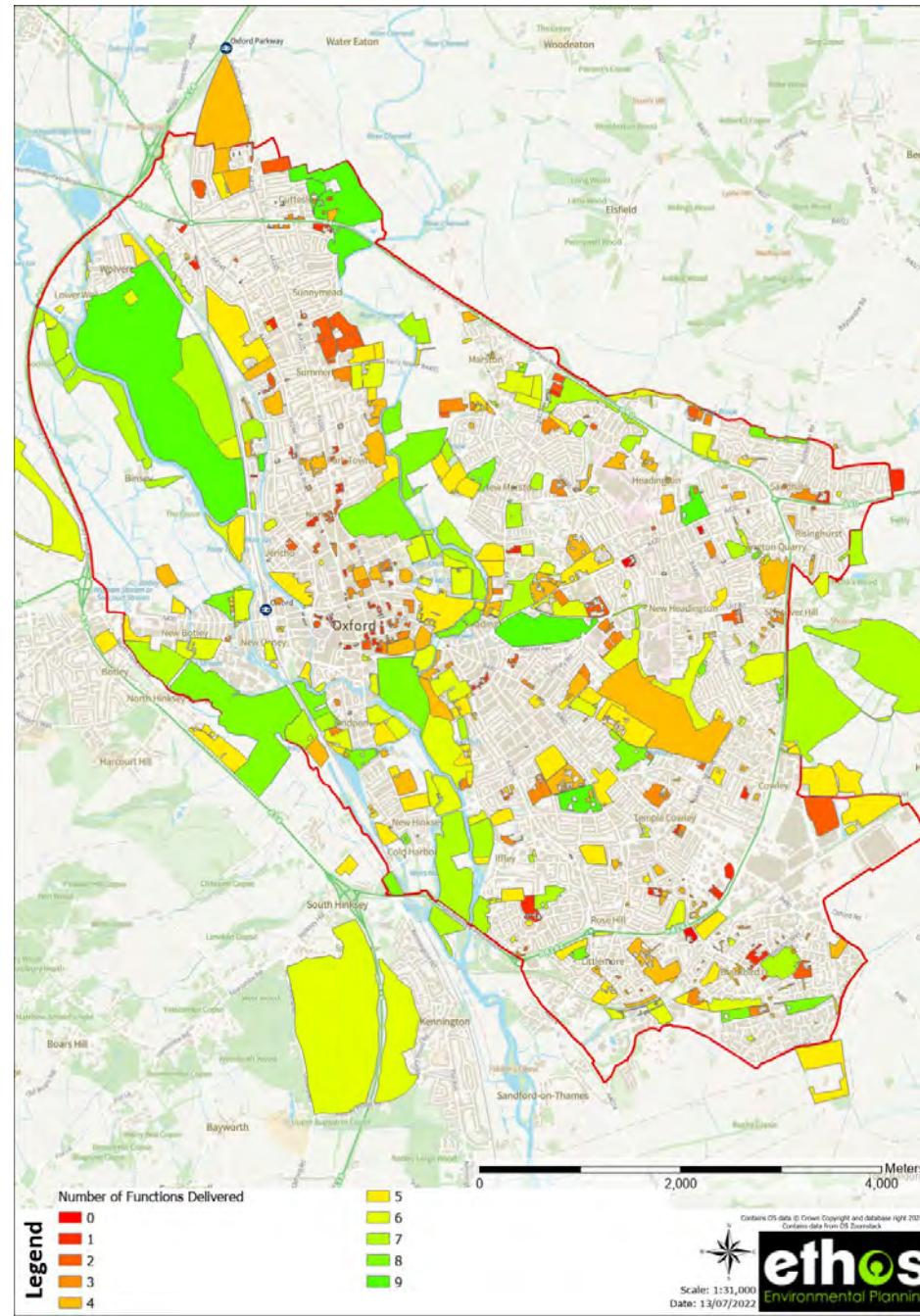
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- 4.4 Green infrastructure in the city performs a vital role in supporting the health and wellbeing of our residents; providing habitat for biodiversity; building resilience to climate change and can provide a range of other environmental benefits such as mitigating flood risk through reducing impermeable surfaces and slowing run-off, ameliorating air quality and reducing noise where this is designed appropriately. This wide range of outputs and benefits is sometimes referred to as ecosystems services. The background to this topic is explored in greater detail in the accompanying Green Infrastructure and Biodiversity background paper as well as the Green Infrastructure Study (2022).
- 4.5 Analysis of the existing context of the city has been undertaken by Ethos as part of the Green Infrastructure Study. Through assessing a range of contextual issues and overlaying these over each other, it is possible to identify some potential priority areas that could benefit from new green infrastructure. Seven priority factors were considered, including: level of deprivation (according to the Indices of Multiple Deprivation), population density, percentage of tree canopy cover, access to private gardens, percentage of public open space and risk of surface water flooding. Those areas that scored poorly against the greatest number of these categories are highlighted in red and orange in the below figure, meanwhile, those with the fewest priority factors scored dark and light green. Areas to the east and south score particularly high in terms of number of priority factors, although there are also areas in the centre of the city and up the central spine moving north.



*Figure G1: Priority areas for greening based upon number of priority factors in local area (more detail about the priority factors can be found in the Green Infrastructure Study (2022))*

- 4.6 Many of our green spaces provide multiple functions and benefits to people and wildlife. Ethos have also undertaken an independent, high-level assessment of multi-functionality of these spaces, (assessing to what degree each site performs multiple roles for the wider area). There is no set method for assessing such 'multi-functionality' and this desk-top assessment was purely focussed on identifying the number of functions a site was delivering. Twelve functions were considered, and are detailed in full in the GI study, but include accessibility, food production, children's and youth play, biodiversity, climate adaptation. Larger, publicly accessible spaces typically scored higher in terms of multi-functionality (shown in green in the below figure), demonstrating their important role in supporting health and wellbeing. There are a number of lower scoring sites (shown in red and orange) that could be appropriate for enhancement in future so that they can play a broader role in supporting local residents and wildlife. However, it is important to recognise, that certain types of open space have a specific primary role, for example allotments or churchyards/cemeteries, and it may not always be appropriate for them to be enhanced to the same standard as parks or other amenity green spaces.

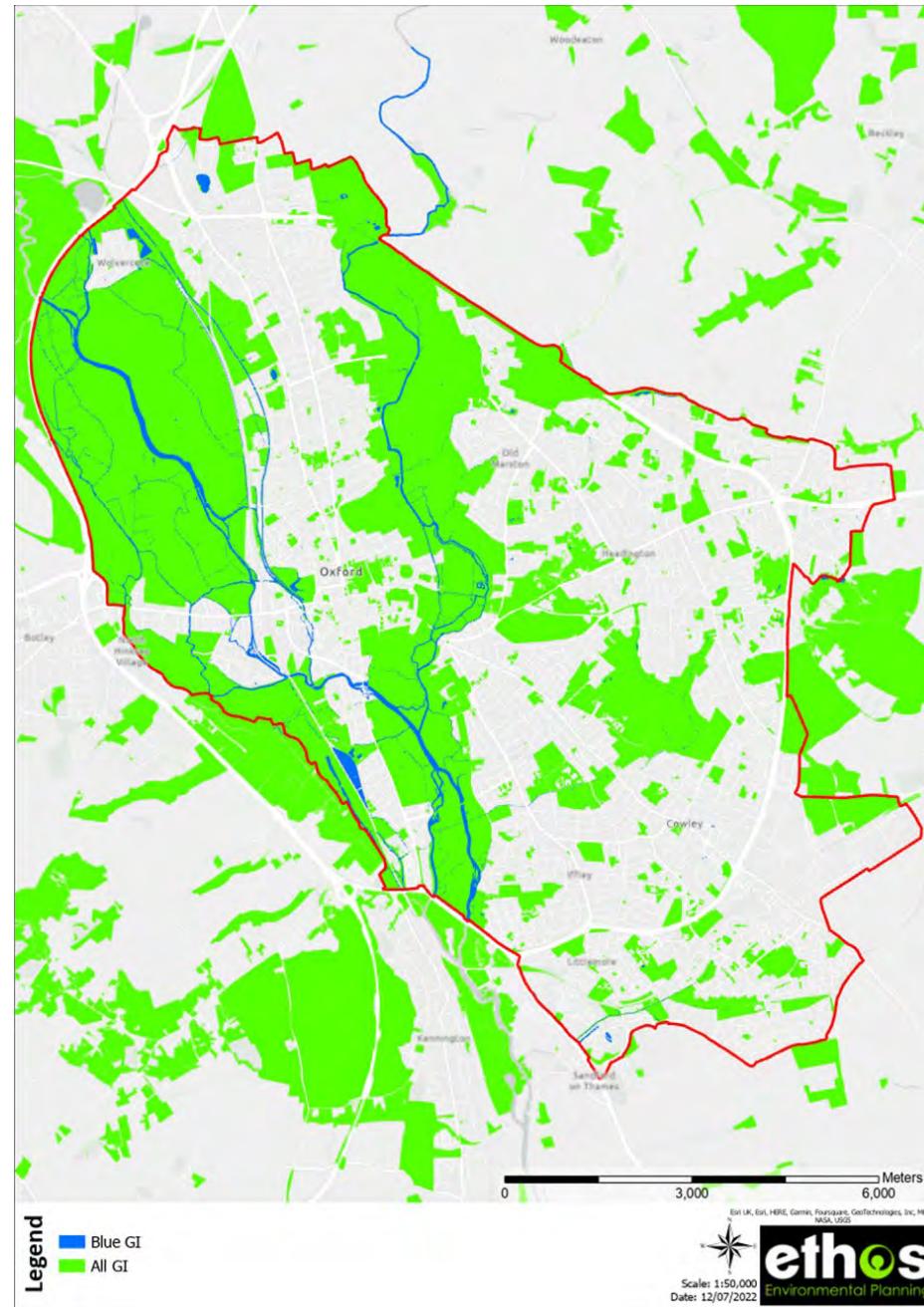


*Figure G2: Overview of multifunctionality of open spaces (details of multifunctionality assessment can be found in Green Infrastructure Study (2022))*

- 4.7 But green infrastructure is under a variety of pressures, from those arising from the need to accommodate new development in a constrained city; to the recreational impacts that occur as people use these spaces, as well as from climate change and pollution. As such, we propose to include a number of policies that would seek to protect the important green spaces we have, as well as to enhance and provide for new green infrastructure in the city wherever possible.

### Protecting the green infrastructure network

- 4.8 Ensuring people have access to a network of green spaces is key objective for the new Local Plan and it is therefore crucial that we continue to protect these existing spaces in the city. The network can be broken down into a variety of typologies of open space, some of these, such as parks and amenity green spaces serve a wider variety of functions than other more specialised spaces, such as allotments and cemeteries. A potential green infrastructure network for the city like the existing network defined in the Local Plan 2036 has been proposed in the Green Infrastructure Study 2022, this is presented in the figure below. It is made up of a variety of open spaces and ecological designations, as well as green belt land. We will need to undertake further analysis and refinement to finalise the network that is to be subject to protection following the consultation, as such this is not finalised.



*Figure G3: Potential Green and Blue Infrastructure Network as identified in the Green Infrastructure study 2022. Note, the map identifies wider green infrastructure beyond the city boundary which would not ultimately be a part of any local policy protection.*

- 4.9 The table of options set out below proposes to protect a network of different open spaces. At this stage, the options consider the protection of the open space network with the same principles applied to all types of space; however, in drafting detailed policies we may formulate individual policies for different types of green space, in a similar manner to the current local plan, for example a policy that protects outdoor sports, or a policy that protects allotments – this will be considered further at the next stage of consultation as we prepare more detailed policies. There is also an option for protecting trees, hedgerows and woodland.

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<b>Policy Option Set G1: Protection of GI network and green features</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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).</b>	<p>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.</p> <p>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.</p> <p>Protecting open space regardless of quality recognises that every space has the</p>	<p>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.</p> <p>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</p>	Preferred Option (in combination with b and c)

		<p>potential to make an important contribution to health and wellbeing as well as wider sustainability, particularly to the local area.</p>	<p>all green spaces unless they are shown to be surplus or can be re provided.</p>	
<b>b</b>	<p><b>In addition to the network, have a series of separate policy protections based on different types of greenspaces (e.g. outdoor sports, biodiversity sites, allotments and greenbelt) and address each specifically. Note that none of these designated sites are considered surplus.</b></p>	<p>This option could allow bespoke policy approaches to specific types of green space and any unique needs/concerns.</p>	<p>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).</p>	<p>Preferred Option (in combination with a and c)</p>
<b>c</b>	<p><b>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.</b></p>	<p>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 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.</p> <p>Some high-quality trees are protected by Tree Preservation Orders (TPOs), but this relies on the Council having been made aware of them and designating in this way. It is unlikely that all high-quality trees in the</p>	<p>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.</p>	<p>Preferred Option (in combination with a and b)</p>

	<b>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.</b>	city are protected in this way however, thus many will not benefit from TPO protection.		
d	<b>Do not define a network of green spaces but assign individual protection to larger strategic sites including public parks, biodiversity sites, allotments, cemeteries and outdoor sports, with sets of criteria relevant to each. Include the wording from the NPPF that sets out protection for all green spaces unless they are surplus or can be reprovided.</b>	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 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.	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.	Alternative Option
e	<b>Do not include a policy protecting green and blue infrastructure and defer to national policy/standards.</b>	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.	Alternative Option (considered detrimental)

## Providing new green infrastructure

- 4.10 The constrained nature of the city means that it can be difficult to deliver substantial amounts of new green space, this means that we need to work harder to secure more innovative uses of available land to accommodate new greening. Local Plan policy can have a role in securing a range of new green infrastructure across different scales of development, from lines of trees and hedges, to making use of peripheral spaces like roof tops and walls, as well as encouraging the use of more natural surface cover in the design of new developments, instead of tarmac and concrete. By ensuring that every new

development considers these opportunities appropriately, we can help to ensure that we maximise opportunities for green infrastructure and secure the various benefits associated with it, whilst cumulatively bringing about a greener healthier Oxford.

- 4.11 The policy options set out below include proposals for more tailored requirements in different areas of the city, or on different scales of development. On larger sites, there is more opportunity for creating new open space so these opportunities should be maximised; whilst particular routes in the city could also be identified as being prime locations for creating new green corridors, linking up existing open spaces and encouraging active travel through neighbourhoods that are more peripheral to local amenities or with lesser access to green space. Equally, the use of an Urban Greening Factor tool (a simple metric tool for quantifying green surface cover) could be an effective means of assessing and demonstrating new development has brought about a net increase in natural surface cover (like green roofs and other green permeable surfaces)— which is essential for building resilience to climate change and can have other benefits, such as for air quality where these elements are designed appropriately and would not impede air pollutant dispersal. The Urban Greening Factor is discussed more in the background paper.

<b>Policy Option Set G2: Provision of new GI features</b>				
	<b>Option for policy approach</b>	<b>Potential positive consequences of the approach</b>	<b>Potential negative/neutral consequences of the approach</b>	<b>Related options, conclusion</b>
a	<b>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:</b> <ul style="list-style-type: none"> <li>i. <b>On specific green corridors</b></li> <li>ii. <b>Compliance with Urban Greening Factor to demonstrate net gain</b></li> <li>iii. <b>% new open space on larger sites</b></li> </ul>	<p>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).</p> <p>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</p>	<p>Quantifying green infrastructure provision and its benefits can be a subjective process which is not an exact science.</p> <p>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.</p>	Preferred Option

	<b>iv. Bespoke guidance on greening within allocations policies</b>	<p>delivery and better quantification of benefits.</p> <p>With better quantification of green infrastructure, comes the potential for better monitoring of what is being delivered in a design proposal.</p>	<p>Potential for more complicated/onerous development management process which would need to be addressed with quality guidance.</p>	
<b>b</b>	<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.</b>	<p>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.</p> <p>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.</p> <p>Requiring open space provision on smaller sites could lead to small, unusable spaces that are costly to manage and maintain and offer little value to residents, as has historically been experienced in the city.</p>	<p>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.</p> <p>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.</p> <p>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.</p>	Alternative Option
<b>c</b>	<b>Set out a specific quantity standard of the number of hectares per 1,000</b>	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	Alternative Option

	<b>population for green space provision on all new developments in city.</b>		of population, accessible, or of quality. It is more meaningful to measure and provide greenspaces on a more localised basis. Work on the previous Local Plan 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.	(considered detrimental)
d	<b>Do not include a policy for providing new green infrastructure, defer to national policy/standards.</b>	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.	Alternative Option (considered detrimental)

## An Urban Greening Factor for Oxford

- 4.12 This would be a new policy tool for Oxford, intended to improve the proportion of natural, green surface cover achieved on new development and is particularly well suited to areas that are highly urbanised and constrained, as is the case for many sites in the city. Reducing levels of artificial surfacing and replacing these with natural cover (e.g., greening of driveways, rooftops and walls) could have a variety of benefits, including for climate resilience and mental health of residents. The tool is not intended to replace other documents such as the DEFRA biodiversity metric, or the need for submission of landscaping details alongside a proposal, but is instead, intended to supplement that work and help quantify how greening features have been incorporated into design. A full analysis of the tool, including how it could be used in a policy, the strengths and weaknesses of it, and how it might be applied across the city, is set out in the background paper. Variations of the urban greening factor are now in application in various locations around the UK, including London and Southampton.

4.13 The key requirement is that a level of betterment is demonstrated as a result of the development using the tool and that this would be submitted alongside the planning application as evidence. Beyond this, there are a variety of options for the scale of application across the city, it could either be targeted to specific sites or areas, or be applied more widely, and these options are set out below.

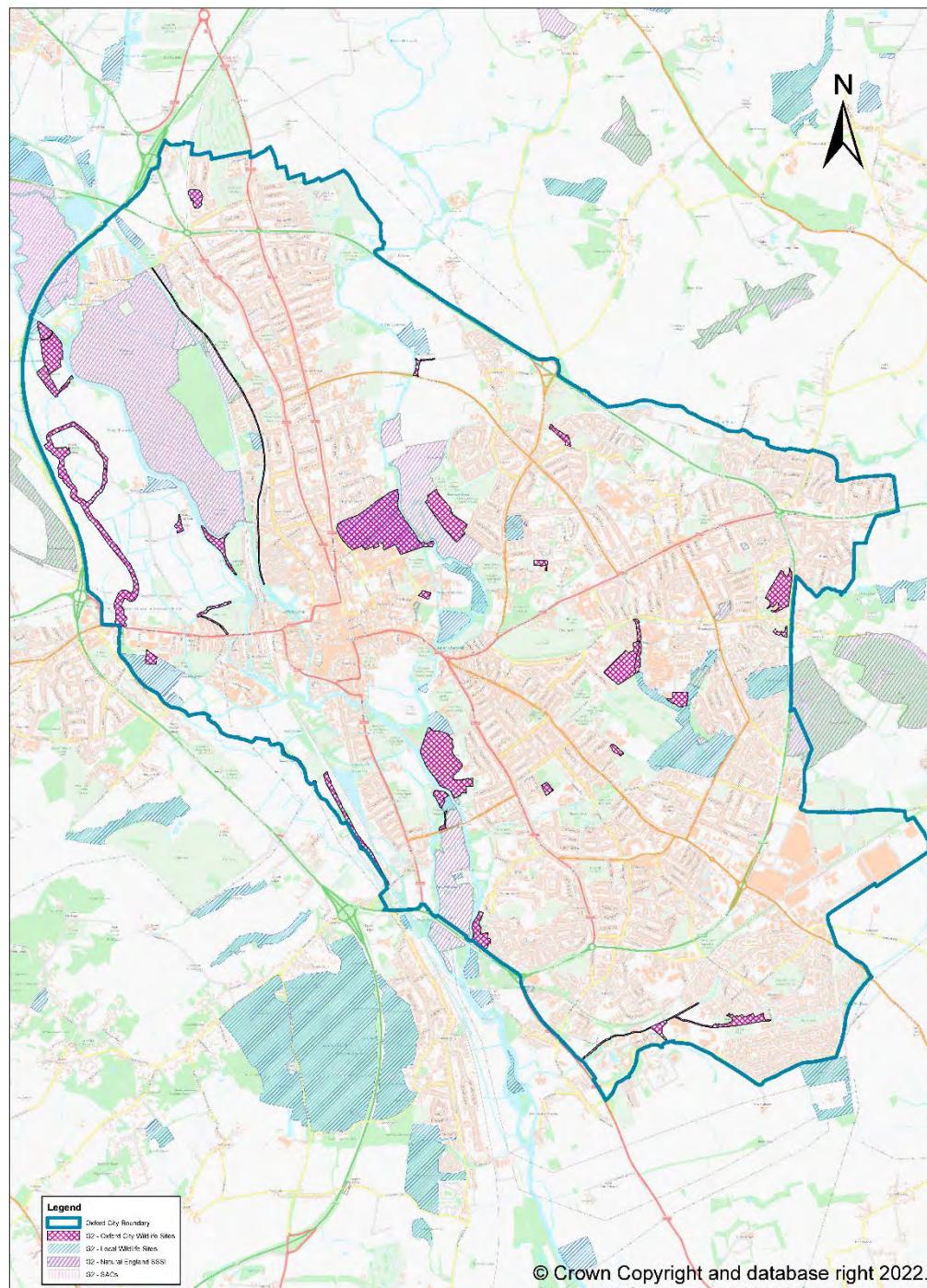
Policy Option Set G3: Provision of new GI features – Urban Greening Factor				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Incorporate the use of an Urban Greening Factor into policy, requiring proposals to demonstrate a betterment in score (above a minimum) as part of the design of the development.</b>	<p>Would allow for greening on sites to be quantified and seeking a betterment should help to green the city over time.</p> <p>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.</p> <p>Could be well suited to more constrained sites due to promoting use of often wasted spaces such as walls and rooftops.</p>	<p>The simplicity of UGF tools means they are fairly limited at distinguishing quality/condition of greening measures.</p> <p>Where designs incorporate more complex features, their suitability will still need relevant expert assessment for quality/management etc as with any other application.</p> <p>They are not a replacement for ecological analysis and associated metrics such as DEFRA Biodiversity metric.</p> <p>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.</p>	Preferred Option (in combination with b)
b	<b>The scale of application of the UGF tool could be across select</b>	This avoids unnecessary work by avoiding areas that are already particularly green. It	Could be missing out on opportunities to promote greening elsewhere in the city –	Preferred Option (in

	<p><b>sites/areas of the city, whilst its use is encouraged but not mandatory elsewhere. Potential areas of application could be:</b></p> <ul style="list-style-type: none"> <li>- Major applications</li> <li>- Specific site allocations which are not already sufficiently green.</li> <li>- Retail/district centres</li> <li>- Areas of deficit of green surface cover and/or heightened climate risk.</li> </ul>	<p>is sensible to target the approach to areas in the city where the use of the tool and securing betterment would be required.</p>	<p>encouraging the tool's use may not be strong enough to get applicants to use it elsewhere.</p>	<p>combination with a)</p>
c	<p><b>The scale of application of the UGF tool could be mandatory across all developments in the city.</b></p>	<p>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.</p>	<p>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.</p> <p>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.</p>	<p>Alternative Option</p>
d	<p><b>Do not incorporate an UGF into policy.</b></p>	<p>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,</p>	<p>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</p>	<p>Alternative Option</p>

	however, it is an additional ask of applicants.	adaptation, mental and physical health and wellbeing and biodiversity.	
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## Biodiversity and Ecology

- 4.14 The green infrastructure network is made up of a variety of typologies of green space and a key component of this network are those sites which are particularly important for ecology and geodiversity. There is a hierarchy of nationally and locally designated sites across the city for their special ecological value which are subject to varying levels of protection and merit protection. Not only are these spaces refuges for sensitive flora and fauna, but they also support the wider ecological network that spans across the county. This topic is explored in greater detail within the accompanying Green Infrastructure and Biodiversity background paper.



*Figure G4: Sites of ecological and biodiversity importance*

- 4.15 The UK is suffering from biodiversity decline at varying scales for a variety of reasons, from climate change to habitat fragmentation. Urban areas have been shown to be experiencing particularly pronounced levels of decline due to pressures of new development and pollution from a range of sources. Beyond protecting designated sites, it's also important to recognise that elsewhere in the city there may be important habitats or species that are worthy of protection and it will be important for new development to consider these in the design of any proposals. New development, when planned properly, can contribute to improving biodiversity in the city too.
- 4.16 The Environment Act 2021 received royal assent and the provisions related to ecology and biodiversity are expected to come into force in late-2023. A key provision is the requirement for most new development to deliver a minimum 10% biodiversity net gain; an increase on the 5% required by the Oxford Local Plan 2036. Local planning policy can potentially shape how net gain is delivered, for example by identifying what strategies developers should consider in delivering net gain. The following also sets out options for how we can further support biodiversity net gain in the city beyond the Environment Act, but also how we will protect the most valuable ecological sites in the city from development.

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## Biodiversity net gain and the environment bill

- 4.17 Developers must follow the mitigation hierarchy, which requires them to avoid, minimise and mitigate impacts on ecology and biodiversity, compensating for losses only as a last resort. The Defra Metric is constructed in a way that encourages net gain to be delivered by avoiding impacts on valuable habitats in the first instance, then enhancing existing habitats and finally, by creating new ones.
- 4.18 Where developers are unable to achieve at least 10% net gain on-site, they will have the options of delivering it off-site either by delivering gains on other land under their control, by paying a third-party to deliver offsetting on their behalf (e.g., through a habitat bank) or as a last resort by purchasing a statutory credit.
- 4.19 This is a key consideration for Oxford as often the density of proposed development, in addition to the presence of other constraints around public open space and drainage, make it very challenging (and in some cases impossible) to deliver net gain on-site. Therefore, offsetting is frequently required.

- 4.20 Details of how exactly the requirements of the Environment Act are to be implemented in practice are still to be confirmed; however, it is assumed that there will be a role for local policy in helping to steer elements of the Act such as how off-site net gain is delivered. The biodiversity metric encourages off-site gains to be delivered in the same district but does not require this. Net gains that cannot be accommodated onsite should first be steered into the local area, with the next preference being to sites elsewhere in the city that require enhancement, and then to identified priority areas for biodiversity within the wider county, as informed by a relevant strategy. The lack of habitat banks in Oxford City and the limited availability of land means it may be necessary to work through this hierarchy. It is also for this reason that whilst we could potentially go beyond the 10% net gain requirement, and have set out an option for it below, this would not necessarily be delivered within the city boundaries. It may be preferable to explore other options that focus on delivering additional ecological enhancements onsite, as are explored following this section. Opportunity areas within Oxfordshire are to be highlighted within the forthcoming Local Nature Recovery Strategy likely to be prepared by Oxfordshire County Council and the Oxfordshire Nature Recovery Network.

<b>Policy Option Set G4: Delivering mandatory net gains in biodiversity in Oxford</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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. Guidance would seek to secure off-site delivery in the local neighbourhood in first instance, then within city boundary, then county. Off-site delivery within Oxfordshire, if no opportunities are available in the city, would be sought within the opportunity areas of the forthcoming Local Nature Recovery Strategy, and the Oxfordshire Nature</b>	The supporting guidance for how the requirements of the Environment Act should be implemented is still being developed. Whilst the Act sets out certain requirements, e.g. mandatory 10% net gain on new development, it is likely that there will be a role for local policy in determining how broader matters such as off-site delivery are implemented. 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.	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 effectiveness and options further afield, even beyond the boundary, may be necessary regardless. Off-site offsetting may also deliver better outcome for biodiversity if geared towards landscape-scale nature conservation.	Preferred Option

	<b>Recovery Network. Payment to a body managing schemes would be the final option in the hierarchy</b>			
<b>b</b>	<b>Require higher than 10% net gain on certain sites, in excess of the minimum requirements of the Environment Act.</b>	Recognises the importance of supporting biodiversity and acting on biodiversity decline nationally.	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, and that mitigation can't all be within the city, but will be through contributions to schemes across the county.  Additional demands in terms of net gain could impact ability/viability to provide for other needs. The expense of this will affect the affordability and therefore selection of other policy approaches that are equally important.	Alternative Option (considered detrimental)
<b>c</b>	<b>Do not include a policy addressing biodiversity net gain requirements as set out in Environment Act, defer to national guidance/policy.</b>	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 offsite delivery elsewhere in city (and as last resort beyond city). Could result in limited benefit to local area.	Alternative Option (considered detrimental)

## Protecting and providing for biodiversity onsite in Oxford

- 4.21 As noted in the introduction to this section, there are many sites in the city with the potential for supporting valuable flora and fauna and it is important that applicants consider this before they apply for planning permission. Biodiversity net gain is concerned with protecting, enhancing and creating habitats. Protected species are considered entirely separately in the planning process. Planning policy needs to consider how development will affect existing flora and fauna.
- 4.22 The development process also 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, wildflower planting, and hedgehog holes. There is likely to be a role for a local policy that requires wildlife-friendly development, this could be a valuable way of making space for nature that may be easier to secure on smaller more constrained sites where the net gain requirement may not result in many ecological enhancements on-site. This would also help demonstrate how Oxford City Council is seeking to meet its revised duty to conserve and enhance biodiversity that will be established when the Environment Act comes into force.
- 4.23 One means of providing certainty for applicants and officers in what is expected would be by setting out a list of potential biodiversity measures we would want to see on sites. This list of measures would be put together in agreement with the Council's ecologist and other key stakeholders so that it represents simple but meaningful features that would be most suitable to supporting the city's natural environment and local species that could benefit most. A more prescriptive policy could set out a minimum number of measures to be secured at different scales of development (e.g., minor or major). Applicants would be asked to demonstrate that they have scored a number of points from a published biodiversity points list, an example of which (that would need to be tailored to Oxford's specific context) is included in the figure below.

- 1 A bird box for every apartment  
 2 A biotope for specified insects in the courtyard (water striders and other aquatic insects in the pond)  
 3 Bat boxes in the courtyard  
 4 No surfaces in the courtyard are sealed, and all surfaces are permeable to water  
 5 All non-paved surfaces within the courtyard have sufficient soil depth and quality for growing vegetables  
 6 The courtyard includes a rustic garden with different sections  
 7 All walls, where possible, are covered with climbing plants  
 8 There is 1 square metre of pond area for every 5 square metres of hard-surface area in the courtyard  
 9 The vegetation in the courtyard is selected to be nectar rich and provide a variety of food for butterflies (a so-called 'butterfly restaurant')  
 10 No more than five trees or shrubs of the same species  
 11 The biotopes within the courtyard are all designed to be moist  
 12 The biotopes within the courtyard are all designed to be dry  
 13 The biotopes within the courtyard are all designed to be semi-natural  
 14 All stormwater flows for at least 10 metres on the surface of the ground before it is diverted into pipes  
 15 The courtyard is green, but there are no mown lawns  
 16 All rainwater from buildings and hard surfaces in the courtyard is collected and used for irrigation  
 17 All plants have some household use  
 18 There are frog habitats within the courtyard as well as space for frogs to hibernate  
 19 In the courtyard, there is at least 5 square metres of conservatory or greenhouse for each apartment  
 20 There is food for birds throughout the year within the courtyard  
 21 There are at least two different old-crop varieties of fruits and berries for every 100 square metres of courtyard  
 22 The facades of the buildings have swallow nesting facilities  
 23 The whole courtyard is used for the cultivation of vegetables, fruit and berries  
 24 The developers liaise with ecological experts  
 25 Greywater is treated in the courtyard and re-used  
 26 All biodegradable household and garden waste is composted  
 27 Only recycled construction materials are used in the courtyard  
 28 Each apartment has at least 2 square metres of built-in growing plots or flower boxes on the balcony  
 29 At least half the courtyard area consists of water  
 30 The courtyard has a certain colour (and texture) as the theme  
 31 All the trees and bushes in the courtyard bear fruit and berries  
 32 The courtyard has trimmed and shaped plants as its theme  
 33 A section of the courtyard is left for natural succession (that is, to naturally grow and regenerate)  
 34 There are at least 50 flowering Swedish wild herbs within the courtyard  
 35 All the buildings have green roofs

Figure G5: An example of a green points list highlighted in the TCPA expert paper 'The Green Space Factor and the Green Points System' (2011)<sup>1</sup>

<b>Policy Option Set G5: Protecting and enhancing onsite biodiversity in Oxford</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
<b>a</b>	<b>Include policy requirements that seek to ensure applicants identify/assess/protect any existing habitat of value on a site.</b>	Whilst a separate policy would address protected designated sites, there are often habitat features/species that exist elsewhere 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.	Preferred Option (in combination with b)

<sup>1</sup> <https://tcpa.org.uk/resources/the-green-space-factor-and-the-green-points-system/>

<b>b</b>	<p><b>Policy with prescriptive requirements to secure biodiversity features on site. Could require a specific enhancement on each site selecting from a pre-defined ‘biodiversity points list’ (e.g. bat box, bird box, wildflowers), or a minimum number of points (potentially one target for minors and higher target for majors). Could potentially be supported by updated TAN.</b></p>	<p>Highlights on-site biodiversity measures as a priority for the Local Plan/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 in gaps left by Environment Act which may result in off-site compensation for on-site impacts.</p> <p>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.</p>	<p>Every site is likely to be different, risk that a prescriptive list/point system could be too blunt a tool, limiting any benefits.</p> <p>On more constrained sites, the scope for biodiversity enhancements will still be challenging.</p>	Preferred Option (in combination with a)
<b>c</b>	<p><b>Policy that requires biodiversity features/ ecological measures but is not prescriptive about what measures are incorporated/or how much/or the standard of those measures. Could potentially be supported by updated TAN.</b></p>	<p>Highlights on site biodiversity measures as a priority for the Local Plan/Council.</p> <p>Allows more flexibility than Option b for developers to work within the constraints of a site.</p>	<p>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.</p>	Alternative Option (in combination with a)
<b>d</b>	<p><b>No bespoke policy on supporting biodiversity on site, instead, via complimentary policies (e.g. sustainable design and construction), include requirements to incorporate general ecological enhancements.</b></p>	<p>Constrained city means achievable measures could have limited effect anyway, protection of established ecological sites nearby may be more effective overall.</p>	<p>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 terms could be limited.</p> <p>A specific policy would highlight this as a priority for the Council, not including one could weaken this position.</p>	Alternative Option (in combination with a)

			General encouragement of ecological enhancements means effectiveness of policy is hard to quantify and monitor.	
e	<b>Do not include a policy for protecting and enhancing on site biodiversity, defer to national policy/standards.</b>	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. 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 city). Could result in limited benefit to local area and lead to ecological impoverishment.	Alternative Option (considered detrimental)

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## Protecting Oxford's ecological network

- 4.24 Earlier in this chapter, several options have been set out relating to wider green infrastructure network and the protection of key typologies of green space (e.g. parks, allotments, cemeteries, outdoor sports). But the city also hosts a hierarchy of ecological sites, from the internationally and nationally important SAC and SSSIs to more locally valuable designations, such as Local Wildlife Sites, Oxford City Wildlife Sites<sup>2</sup> and Local Nature Reserves. The ecological sites not only form an integral part of the wider green infrastructure network but are valuable in themselves for the role they play in supporting our flora and fauna and should be protected from development which could compromise their special features. In addition, we are currently reviewing the local sites and considering whether there are any additional sites in the city which ought to be protected as part of the ecological network for their local biodiversity value, more detail will follow in the next consultation.

### Policy Option Set G6: Protecting Oxford's ecological network

<sup>2</sup> Oxford City Wildlife Site (OCWS) are sites of local importance for wildlife and nature, because of either connectivity, rare or exceptional features, habitat provision, diversity and/or local value for naturalness, learning and appreciation of nature.

	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<p><b>Include a policy which protects the city's network of national and local designated sites from development. Set out that proposals will need to consider a range of potential impacts depending on the context of application and proximity to any protected site(s), particularly, but not limited to:</b></p> <ul style="list-style-type: none"> <li>- <b>Loss of protected land</b></li> <li>- <b>Recreational impacts</b></li> <li>- <b>Changes to the hydrological regime (groundwater, primarily),</b></li> <li>- <b>Impacts on water quality</b></li> <li>- <b>Impacts from air pollution</b></li> </ul> <p><b>Define hierarchy within the network, with level of protection based upon importance/value of species/habitat they have been designated for such as:</b></p> <ul style="list-style-type: none"> <li>• <b>International designations (SAC)</b></li> <li>• <b>National designations (SSSIs)</b></li> <li>• <b>Irreplaceable habitats and Local Wildlife Sites</b></li> </ul>	<p>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.</p> <p>Protection of SACs set in legislation, protection of SSSIs and irreplaceable habitats set in NPPF. No specific protection for locally designated sites, although the NPPF requires local plans to identify, map and safeguard such sites.</p> <p>Oxford City Council 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). It is appropriate to ensure the level of protection is proportionate to the level of ecological interest.</p> <p>Also ensures protection of sites/habitats that are of notable ecological value but this has not been previously identified through selection of designated sites.</p>	<p>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.</p> <p>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 protecting biodiversity, but will necessarily be limited as space is secured for other purposes like this.</p>	Preferred Option

	<ul style="list-style-type: none"><li>• Priority habitat</li></ul>			
<b>b</b>	<b>Do not include a policy protecting ecological sites and defer to national policy/standards.</b>	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.	Alternative Option (considered detrimental)

## Climate resilience

- 4.25 Climate change is the greatest threat facing society today and the way we design and build the built environment has a key role to play, not only in how we mitigate our impacts on the climate, but also in how we can withstand the impacts of a changing climate in future. This chapter contains policy options that show how we will secure radical reductions in carbon emissions needed over the next couple of decades, whilst policy options for building Oxford's resilience to climate change into the future are set out below. A certain amount of climate change is already effectively baked into our future, even if the world were to stop emitting carbon tomorrow, due to the long-term effects of the carbon already within the atmosphere, so adaptable and resilience will be essential.
- 4.26 Oxford's risk from future climate change is primarily related to flooding and overheating as has been explored in the accompanying climate risk assessment. A significant amount of the city lies within areas of higher flood risk. Climate change is projected to bring about wetter winters, and more intense rainfall events that could exacerbate this flood risk. A further climate hazard relates to overheating, the city is heavily urbanised with significant areas of artificial surface cover which generally tend to exacerbate heat compared with more rural surroundings (also known as the urban heat island effect). Again, as with much of southern England, climate change is expected to exacerbate this problem, with future climate expected to involve hotter, drier summers and more heat wave events.
- 4.27 The burden of climate change is not an equal one, with the elderly, the young and the disabled typically being more at risk to its impacts than others. Furthermore, the pronounced inequalities we see across our communities is likely to exacerbate the unequal burden of risk from climate change's impacts, with the most deprived communities being subjected to the highest levels of risk. These communities tend to have fewer financial resources to implement their own adaptation measures such

as air conditioning, or flood-proofing for example. Equally, we tend to see higher incidences of poor health and life-limiting health conditions which can be exacerbated by climate risks in more deprived communities and households.

- 4.28 For these reasons, a strong set of policies is needed that can help to ensure that development is adapted to future climate change and that we avoid unintentional maladaptation (design choices that could exacerbate risks). Alongside other policies such as those relating to design and health impact assessment, the following options have been prepared to cover these issues.

### Fluvial flood risk and new development

- 4.29 The most significant source of flood risk is fluvial in nature, arising from the city's particular geography sitting at the confluence of two rivers, as well as the canal and a variety of smaller water courses. Flood risk, in terms of frequency and duration of flooding, is likely to increase with climate change. These issues are explored in greater detail in the accompanying Flood Risk background paper.
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4.30 Due to the constrained nature of the city, the need for housing and regeneration in certain areas, and the broad expanse of flood risk zones, it is unlikely that all development will be able to avoid flood risk entirely, and that some will take place in areas at risk from flooding. It is therefore crucial that the Local Plan includes a strong policy to ensure new development is informed by a Flood Risk Assessment (FRA) where required and takes places in an appropriate way that is cognisant to these risks, safely managing them, preventing increase, and facilitating reduction in flood risk where possible. Also, we will need to ensure that new development that does come forward is safe in terms of access and egress and would not put undue burden on emergency services. But there are decisions to be taken as to what levels of risk we as a city are happy to accommodate.
- 4.31 National policy sets out when the sequential test<sup>1</sup> will be needed to inform proposals, and when the exception test<sup>2</sup> should be applied. Ultimately, new development needs to avoid areas of highest flood risk wherever possible and must not exacerbate flood risk elsewhere. There are situations where certain types of development are too high risk within the flood zone (for example self-contained basement accommodation). However, there may be occasions where development can be brought forward with the incorporation of appropriate resistance and resilience measures and subject to specific limitations, where it may otherwise have been unacceptable – for example within brownfield areas of the functional flood plain (3b). Not only would this allow for the potential of locating development in the most sustainable locations for accessing other

services/amenities in the city and for meeting other objectives such as the pressing need for new affordable housing, but it could also allow for flood risk to be improved on existing sites through careful regeneration and incorporation of high-quality flood mitigation measures.

## The Oxford Flood Alleviation Scheme (OFAS)

- 4.32 The OFAS is a partnership project led by the [Environment Agency](#) which will create a new stream approximately 5km long starting just north of the Botley Road and passing under the A423 Kennington Railway Bridge (Southern by-pass) to the south before re-joining the River Thames . OFAS will reduce flood risk from the River Thames to businesses, residential properties, major roads and the railway development particularly at risk from flooding in the Botley and Abingdon Roads area. The scheme will incorporate environmental improvements to the area, including creating new wetland which will link up existing wildlife sites.
- 4.33 Flood management in the city is primarily managed by the Oxford Area Flood Partnership which includes the Environment Agency, Network Rail, Oxford City Council, Oxfordshire County Council, Vale of White Horse DC and Thames Water plc.

Policy Option Set G7: Flood risk and Flood Risk Assessments (FRAs)				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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</b>	This option would make explicit the 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.	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.	Preferred Option (in combination with b, c and d - with either e, or f)

	<b>where flood risk could be impacted off-site.</b>	Despite strength of national policy regarding flood risk, it does have some weaknesses/ambivalence towards certain situations, for example how FRA is to be applied to extensions, and local policy can provide greater certainty regarding our expectations.		
<b>b</b>	<b>For extensions proposed within floodzone 3b – set out some key principles/requirements that will need to be met to address flood risk before these will be permitted.</b>	Applications for extensions are a regular occurrence across the city, including within floodzone 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.	Preferred Option (in combination with a, c and d - with either e, or f)
<b>c</b>	<b>Prevent self-contained basement flats in areas at risk from fluvial flooding.</b>	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 areas.	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 FZ 3 and subject to an exemption test in FZ2 so a specific option would not be considered necessary.	Preferred Option (in combination with a, b and d - with either e, or f)

<b>d</b>	<b>Prevent culverting of open watercourses.</b>	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.	Preferred Option (in combination with a, b and c – with either e, or f)
<b>e</b>	<b>Allow only water compatible uses and essential infrastructure in undeveloped flood zone 3b. However, allow limited development (e.g., redevelopment of existing structures) on brownfield within zone 3b, with high standard of mitigation, where built footprint of a site is not increased and where risk is demonstrably decreased. Apply sequential test for development in other flood zones in accordance with national policy. In any circumstance where proposal would conflict with safe access and egress requirements, it would be refused.</b>	<p>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.</p> <p>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.</p>	<p>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.</p> <p>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?</p>	Option (in combination with a, b, c and d)
<b>f</b>	<b>Allow only water compatible uses and essential infrastructure</b>	Same positives as above for option B, except, this option allows for greater use	Where development is proposed on brownfield sites in flood zone 3b, it will be	Option (in combination

	<b>in undeveloped flood zone 3b. However, allow limited development (e.g. redevelopment of existing structures) on brownfield within 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 proposal would conflict with safe access and egress requirements, it would be refused.</b>	(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.	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.	with a, b, c and d)
g	<b>Prevent development of greenfield sites within flood zone 3a, but with specific exemptions (e.g. for allocated sites).</b>	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.	Alternative Option (considered detrimental)
h	<b>Do not include a policy about flood risk but rely on national policy instead.</b>	Simply relying on national policy could be easier for developers to understand and work with.	Oxford has a unique flooding environment and particular constraints on development in city. There is a risk that a more generalised approach misses opportunities to address this.	Alternative Option (considered detrimental)

	National policy on flood risk is fairly developed and well tested and may ultimately be transferred into National DM policies.	
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## Surface water flood risk and mitigation measures

- 4.34 Flood risk also arises from surface water flooding sewers and groundwater. Where new development comes forward and incorporates expanses of hard, impermeable surface cover, it is likely to increase the risks of certain types of flooding such as surface water and sewers because of the increases in surface run-off. Considering the potential for more occurrences of intense, heavy rainfall events in future due to climate change, these risks are likely to be exacerbated. Incorporating Sustainable Drainage Systems (SuDS) into new development and appropriate drainage measures can help to mitigate these risks. However, opportunities to minimise risks arising in the first place should always be sought, although we acknowledge that some development such as hard surfacing over front gardens can be undertaken under permitted development rights.
- 4.35 Sustainable drainage systems (SuDS) can take many forms but green, natural flood storage solutions, such as swales and tree pits have additional benefits for the environment and the quality of new development, introducing multi-functional benefits that can contribute to biodiversity, mental health, urban cooling as well as improving water quality by filtering out contaminants before they are introduced into more sensitive environments. Two best practice examples have been included below.



Figure G6: London Borough of Enfield (susdrain)

Figure G7: Leeds Skelton Lake Services (susdrain)

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- 4.36 Drainage considerations are also important for ensuring that the city's sewer system can cope with additional pressures from new development, however, they are also important for other reasons. It will be essential to ensure that new development assesses and mitigates any impacts they may have on surface and groundwater flows (as covered in the next options table - R3) which could negatively impact upon some of the most sensitive ecological sites in the city, such as the Lye Valley, the SAC and the SSSIs.

Policy Option Set G8: Sustainable Drainage Systems (SuDS)				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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.</b>	Same benefits as option A, but with more detailed specifications on the types of SuDS to be implemented, with a priority given to green, natural features.	Whilst well-designed SuDS can deliver multiple benefits, this should not come at the cost of their role as flood risk mitigation where this is required – potential this could be complicated by	Preferred Option (in combination with b)

	<b>Incorporate hierarchy style approach to SuDS design, prioritising green SuDS and maximising multi-functionality.</b>	Green, multi-functional SuDS can contribute to wider placemaking and have variety of benefits that extend beyond water management, including improving water quality, reducing urban heat, promoting biodiversity and better placemaking.	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 costs of schemes.	
b	<b>Expect that foul water is separated from surface water drainage on development sites.</b>  <b>Require a Foul and Surface Water Drainage Strategy for all new build residential development of 100 dwellings or more; non-residential development of 7,200sqm or more; or student accommodation of 250 study bedrooms or more.</b>	Would ensure that appropriate consideration is given to foul water drainage and how this is handled on a 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.	Preferred Option (in combination with a)
c	<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.</b>	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 pressure on sewers.	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.	Alternative Option

		Sets out that SuDS would be required on minor schemes also (which are not addressed in national policy).		
d	<b>Do not include a policy about SuDS but rely on national policy instead.</b>	There is a variety of industry guidance about good design for SuDS which could be utilised by developers. Equally 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.	Alternative Option (considered detrimental)

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## Groundwater flows and sensitive sites

- 4.37 There are several ecological sites in the city which are sensitive to changes in groundwater flows and impacts on hydrological environment. New development can potentially have impacts on local hydrology and this needs to be assessed and appropriately mitigated where it has the potential to negatively affect sensitive sites.

Policy Option Set G9: Groundwater flows and sensitive sites				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Require assessment of impacts on ground/surface water flows where a</b>	This option would seek to ensure that proposals take account of any impacts they	Could reduce the capacity of development sites in proximity to sensitive sites (unless	Preferred Option (in

	<b>development is in proximity of a protected/sensitive site e.g., SAC, SSSI Lye Valley. Only permit development where no adverse effects would result.</b>	might have in relation to ground and surface water flows on nearby sensitive sites and mitigate any potential harmful effects.	appropriate mitigations to water flows can be provided) with subsequent impacts on ability to deliver on other objectives (e.g. housing, employment).	combination with b)
b	<b>Include a bespoke policy for the Lye Valley to consider the impact of development upon the hydrogeology of the Lye Valley SSSI – this would be informed by the results of the Lye Valley hydrogeological study and may need to be supported by separate guidance.</b>	Provides clarity for those seeking to develop within the vicinity of the Lye Valley in terms of what would be considered acceptable development in that it would not reduce the infiltration rates to this important habitat. Could also form the basis of improved validation process for planning application and minimise delays where information is requested later in the process.  Affords protection to this SSSI.	The policy would formalise how the SSSI protections are enforced through the planning process and could lead to delays and more applications being refused in the catchment area(s).	Preferred Option (in combination with a)
c	<b>Do not address ground water and surface water impacts on sensitive sites.</b>	Small scale applications for extensions and larger proposals may be approved within the Lye Valley catchment or within proximity to other sensitive sites.	Lacks clarity for both developers, Natural England and officers determining applications in the Lye Valley.  Not protecting this SSSI.	Alternative Option (considered detrimental)

## Resilient Design and Construction

- 4.38 The policy options set out above are intended to ensure that new development addresses flood risk and the future impacts of climate change in relation to flooding in the city, but climate change is elevating other environmental risks that could negatively impact the city and that will need to be considered in the design of new development. A resilient design and construction policy would help to ensure that proposals address a suite of wider issues to ensure that new buildings and

spaces are well adapted to future climate change, and sustainably designed in a way that can support wider environmental objectives in the plan too. It can help address the other key hazard of future climate change, that of overheating in new development during especially hot summers.

- 4.39 It is likely that several other policy areas in the plan could pick up on some of these issues, for example the embodied carbon policy would guide developers to selecting more sustainable materials that are less carbon intensive to manufacture; meanwhile, design policies will encourage healthy place making of new developments which, when successful, can mitigate consequences of climate change, such as overheating. Equally, the updates to Building Regulations will help to ensure that matters of overheating are addressed upfront in the design of new homes and buildings more so than in previous years. However, having a specific policy that sets out the key issues for adaptation of building design to meet the consequences of climate change, whilst helping to ensure that these are considered individually along with other design considerations set out elsewhere in the plan, would help to ensure that applicants address this as a priority and could help to support our belief that the issue is a key concern for the future growth of the city.
- 4.40 If we opt for including a bespoke policy, rather than relying on Building Regulations alone, then this would be likely to cover a range of issues, from the need for limiting water use in new developments, to the incorporation of a cooling strategy (detailing measures to address overheating like shading, passive cooling etc), flood resistance/resilience measures, infrastructure that is designed to function under future weather extremes as projected to occur due to climate change. It is likely that we would seek to require an applicant to demonstrate that they have designed in accordance with the policy via a design checklist, or a separate resilience checklist that would need to be submitted with or in support of an application.

Policy Option Set G10: Resilient design and construction				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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</b>	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.	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.	Preferred Option (in combination with b)

	<p><b>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:</b></p> <ul style="list-style-type: none"> <li>- <b>Need for climate resilience impact assessment</b></li> <li>- <b>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.</b></li> <li>- <b>Measures to conserve water and specific target for water use</b></li> <li>- <b>Flood resistance/resilience measures</b></li> <li>- <b>Supporting infrastructure such as electricity supply and broadband designed to function in extreme weather conditions (such as prolonged periods of very high temperatures or heavy rainfall).</b></li> </ul>	<p>Bringing the range of policy areas into one checklist could be helpful.</p> <p>Would specifically pick up on issue of overheating in new development 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.</p>	<p>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.</p>	
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	<b>This approach may refer to existing standards, such as BREEAM outstanding.</b>			
<b>b</b>	<b>Require major development to achieve certification against a recognised sustainability assessment – e.g., BREEAM/HQM.</b>	<p>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.</p> <p>Certification would ensure a high standard of sustainable design in major developments and help to ensure consistency across for applicants.</p>	<p>Schemes such as BREEAM are not specifically focussed 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.</p> <p>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.</p> <p>Relying on this kind of certification alone may not fully maximise climate resilience objectives.</p>	Preferred Option (in combination with a)
<b>c</b>	<b>Address climate risks as theme purely through other policies, e.g. design flood risk, green infrastructure. No requirement for specific policy addressing issue.</b>	<p>Ensures resilience/adaptation is central to thinking across local plan policy framework.</p> <p>Avoids repetition of requirements/considerations set out in other complementary policy areas (e.g. flooding and green infrastructure).</p>	<p>Climate resilience aspects can be lost amongst other objectives when they are not given sufficient consideration.</p> <p>There are some specific adaptive measures, and wider sustainable construction issues which may not easily fit into other policy</p>	Alternative Option

			areas without making them overly long/unwieldy.	
d	<b>No policy on climate adaptation/resilience – rely on national guidance.</b>	Some elements of building resilience to climate change will necessarily be covered elsewhere e.g. flood risk requirements are strong in NPPF, overheating will be tackled more fully within building regs from the summer 2022 onward.	<p>Ignores local context – e.g. heritage, dense urban environment.</p> <p>National policy hasn't traditionally been particularly strong on adaptation.</p> <p>Could miss opportunities to tie together benefits for many complementing agendas – e.g. health, air quality.</p>	Alternative Option (considered detrimental)

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

### Introduction and wider context

- 5.1 The other theme with relevance to the environmental pillar of sustainability, but also to the economic and social pillars, is that of being a city that utilises its resources with care and protects the air, water and soil, and is working towards achieving net zero carbon. It is underpinned by four underlying objectives which are as follows:
- Ensuring that resources including land, air, soil, water, and raw materials are used prudently and with consideration of replenishment and renewal.
  - Air quality and its impacts upon public health is improved.
  - Protecting the quality of land, water and soil from development and ensuring human health is safeguarded.
  - Ensuring the city is ready for a zero carbon future
- 164 5.2 Success under this theme will mean that the environment in Oxford, including air, water and land has been protected and improved as the city develops. It will mean that public health is not negatively impacted by reductions in air quality because of new development and that the air quality in the city has actually improved by 2040. Equally, where development is occurring, this will be happening in a way that is considerate of the natural resources used to construct buildings and infrastructure so that our impacts on the local environment, as well as the wider planet, are minimised. In recognition of the climate emergency, our success will also be guided by our actions on reducing carbon emissions in the city, ensuring not only that new buildings are net zero, but also that existing buildings are securing reductions in carbon emissions so that Oxford can achieve its target of becoming a net zero carbon city by 2040.
- 5.3 The options for policies in this section are divided into two groups:
- Mitigating climate change
  - Natural resources

### Aiming for net zero carbon

- 5.4 Oxford has set itself an ambitious target of being a net zero carbon city by 2040 as part of its declaration of a climate emergency, meanwhile, the UK has a national target of becoming net zero by 2050. Recommendations published as part of the UK's most recent carbon budget<sup>1</sup>, which sets out the total greenhouse gas emissions the UK can emit before compromising on its carbon reduction commitments, highlight the pressing need for driving a shift to low and zero carbon technologies across a range of systems including transport, power and heating, as soon as possible. Whilst the Local Plan has limited influence over highways and transport systems, there are policy options that seek to enable people to adopt more sustainable/active transport choice. A greater area that the Local Plan can directly influence is how new buildings are constructed and used, which is the focus of the following sets of options.
- 5.5 A significant proportion of the city's current carbon footprint is caused by the buildings that comprise our built environment, as is shown in the figure below, predominantly these emissions come from the ways we use energy and heat. Almost every new building constructed under the Local Plan 2040 can be expected to still be in operation long after the net zero target dates as outlined above. It means that we need to ensure that any new buildings are designed to be net zero carbon, or net zero carbon ready at the minimum, to avoid the need for retrofitting later and exacerbating our existing carbon footprint. A range of technologies and advances in construction processes means that this is an achievable goal for most developments.

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<sup>1</sup> <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

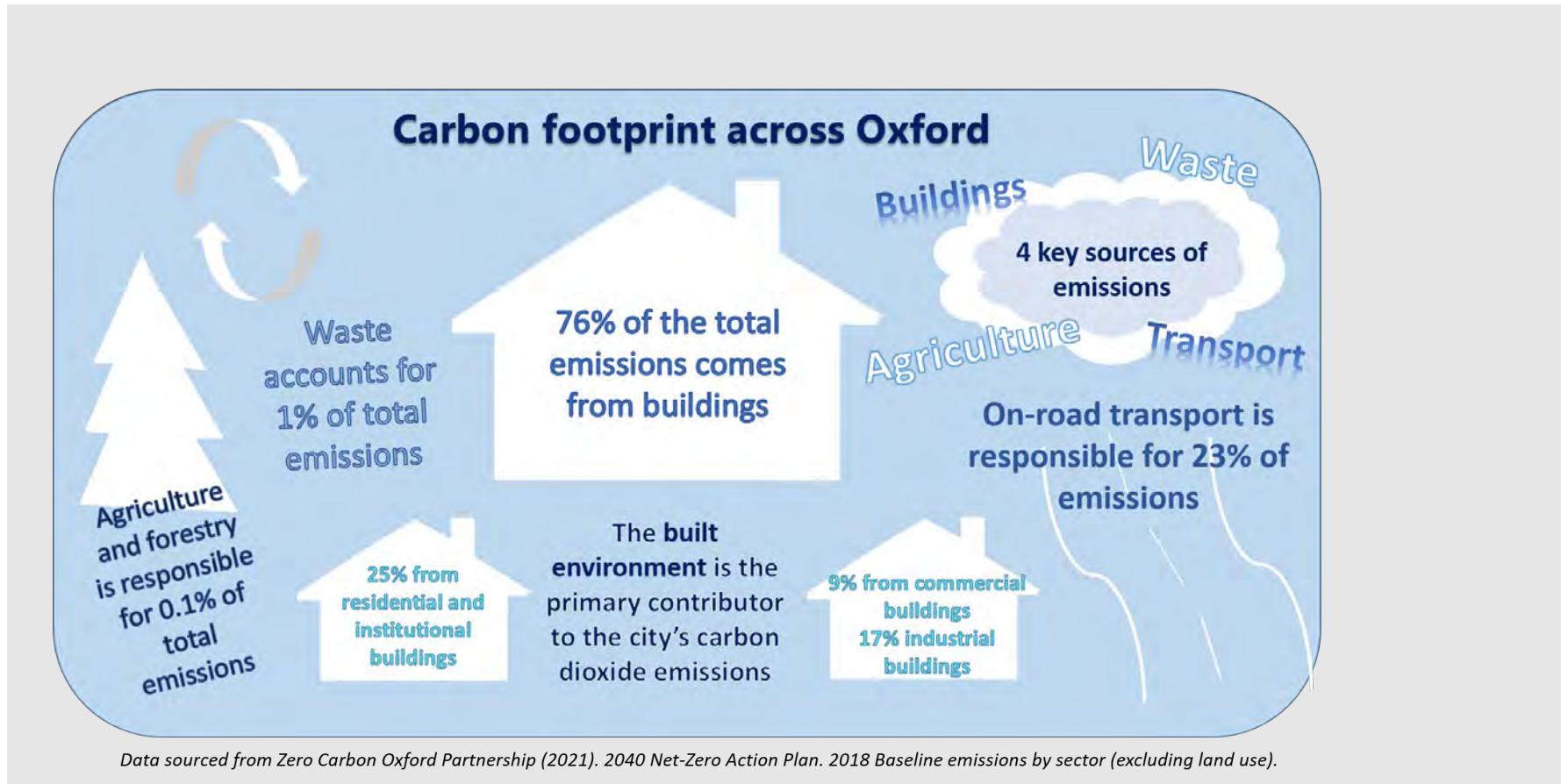


Figure R1: Infographic on carbon footprint/sources of emissions in Oxford.

- 5.6 Of course, it is also important to recognise that there is a significant need for retrofitting existing buildings. The Local Plan has much less direct influence here, unless retrofit projects come forward that require planning permission in future, but our policies can still play an important role in positively supporting such measures where these arise. It should also be acknowledged that there are likely to be significant levels of carbon embedded within the existing building stock, meaning that reuse of existing stock is often the most carbon-efficient approach, even where the current stock is less energy-efficient than a new building would be.

## Net zero buildings in operation

- 5.7 We propose that all developments should follow the principles of the energy hierarchy as set out in the figure below. This would help to ensure buildings are as efficient as possible from the ground up, in that energy use is minimised in the first instance wherever possible. This has added benefits for reducing demand on national grid (challenges around power supply are discussed more in the sites and infrastructure chapter). The carbon reduction background paper gives more detail about the hierarchy, as well as the other elements of the options below.

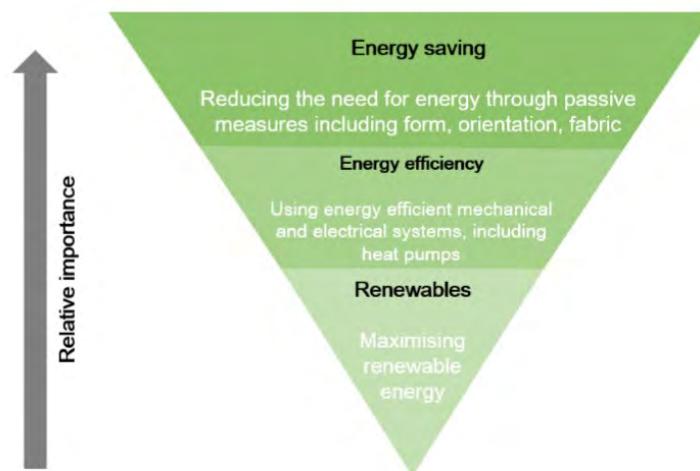


Figure R2: A diagram illustrating the principles of the energy hierarchy (National Design Guide 2019)

- 5.8 As set out earlier, it is imperative that new development is net zero carbon from the adoption of the new Local Plan because it will, in most instances, be around for many decades to come. There are varying definitions of net zero carbon, but in the context of these options we mean that it is *net zero carbon in operation*, i.e., that the amount of carbon emissions associated with the building's operational energy is zero or negative and that energy needs are met from renewable sources (ideally these would be generated on site wherever possible), or at the very minimum, *net zero-carbon ready*, i.e., it does not rely on burning of fossil fuels for energy and is instead powered electrically from the grid (which we expect to continue to decarbonise in the coming years, though an exact timescale on complete decarbonisation cannot be certain), without the need for further retrofit in future. The development will also need to enable occupants to limit the carbon footprint associated

with their daily lives, including the way they travel around the city, the way they deal with their waste and recycling, as well as to reduce the energy use associated with the way they use their buildings beyond heating, lighting and cooking.

- 5.9 However, there are decisions to be made as to the scope of our policies which will need to consider the feasibility and capability of delivering different levels of net zero development. One option is to continue to tackle only regulated energy sources (see figure below), requiring that all regulated energy demands are net zero carbon from the local plan adoption (*in the current LP2036, zero carbon is from 2030*). Understanding around addressing net zero regulated energy is now well developed and this seems achievable. Another option is to go further and require net zero unregulated energy also, which should ultimately deliver total operational energy that is net zero carbon (*the current LP2036 only addresses regulated energy and not unregulated energy*). However, as is explored in the background paper, unregulated energy use is much more challenging for policy to address and for applicants to design for, particularly because it is difficult to plan for the behaviour of occupants once the building is in use. We will need to conduct further feasibility work to understand whether this is an option that is achievable in the city and whether there are only certain thresholds/types of development to which this can be applied.

**Regulated energy:**

"Regulated energy is building energy consumption resulting from the specification of controlled, fixed building services and fittings, including space heating and cooling, hot water, ventilation, fans, pumps and lighting." (*Designing Buildings, 2020*)

**Unregulated energy:**

"Unregulated energy is building energy consumption resulting from a system or process that is not controlled, i.e. energy consumption from systems in the building on which the building regulations do not impose a requirement e.g. IT equipment, lifts, escalators, laptops etc." (*Designing Buildings, 2020*)

**Energy Use Intensity (EUI):**

"The relative efficiency of a building's energy usage. The EUI combines all energy sources and divides them by the square footage of the building" (*Entech Engineering, 2022*)

Figure R3: Definitions for regulated and unregulated energy and energy use intensity.

**Policy Option Set R1: Net zero buildings in operation (*including change of use, conversion and extension where appropriate*)**

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
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a	<p><b>Specify design in accordance with energy hierarchy principles. Mandate net zero operational regulated energy from adoption of the Plan. Measure performance using Energy Use Intensity (EUI) as the primary calculation. Permit no fossil fuel use.</b></p>	<p>Designing in accordance with the energy hierarchy will help to ensure buildings are as efficient as possible from the ground up.</p> <p>Regulated energy use is a well understood area of operational energy consumption and there is good understanding about how to decarbonise it. Assessing net zero 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.</p> <p>Preventing any additional fossil fuel combustion heating systems will help to reduce the need for retro-fit later. This could also ensure that new development does not contribute further to air pollution, including NO<sub>2</sub> levels, but also Particulate matter levels (PM) in the city.</p>	<p>A more prescriptive policy, with specific targets could limit innovation and become outdated more quickly, whilst also making for an overly technical policy.</p> <p>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).</p> <p>Measuring performance through energy use and banning fossil fuel heating (e.g. gas boilers) in policy would divert from government legislation, however it is considered that the ambition of the Plan, and local/national climate objectives cannot be achieved in the absence of this approach, thus this approach seems justified. In addition, the policy process takes several years by which national policy should have been further developed around net zero and it is expected that this policy would be in line with the direction of travel required nationally.</p> <p>This option would not require unregulated energy need to be met through onsite energy generation (which would be the first preference in demonstrating net zero energy on a site). This could have implications for power grid capacity</p>	Option
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			<p>considering expected increasing demands on electricity nationally with the shift to net zero.</p> <p>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.</p>	
b	<p><b>Specify design in accordance with energy hierarchy principles. Mandate net zero total operational (regulated and unregulated) energy from adoption of the Plan. Measure performance using Energy Use Intensity (EUI) as primary calculation. Permit no fossil fuel use.</b></p>	<p>Similar positives to option a, however, option b 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.</p> <p>This option would seek to ensure unregulated energy needs are met through on-site generation wherever possible, potentially reducing demands on main power grid.</p>	<p>Similar negatives to option a, however, option b is likely to be much more challenging.</p> <p>An element of unregulated energy use is determined by occupant behaviour within the building once in operation, something that planning policy and the design/construction process has limited influence on.</p> <p>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 off-setting.</p> <p>Further work will be needed to understand the feasibility of meeting net zero unregulated energy, including feasibility of onsite generation meeting all unregulated needs, as the local plan develops.</p>	Option

c	<p><b>Specify design in accordance with energy hierarchy principles. Mandate ‘net zero ready’ buildings in line with the definitions set out in the Future Homes/Buildings Standard. Measure compliance with submission of SAP/SBEM calculations demonstrating carbon reduction over notional buildings prescribed in Building Regulations.</b></p> <p><b>Permit no fossil fuel use.</b></p> <p><b>Encourage net zero unregulated energy through sufficient on-site renewables to meet total operational energy needs and for this to be demonstrated via Energy Use Intensity calculations.</b></p>	<p>This approach represent a less advanced one to options a and b but would be closer to the direction of travel outlined by central government in its consultations on the Future Homes/Buildings Standard (FH/BS). 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 development in future to bring them to net zero as the national grid decarbonises.</p> <p>As with options a and b, the policy would ban fossil fuels, which is considered in line with government’s future direction of travel.</p> <p>Recognising that the proposals set out in FH/BS do not currently address unregulated emissions, this policy would encourage developers to address unregulated energy through ensuring sufficient on-site renewable energy generation and to demonstrate this via submission of EUI calculations.</p>	<p>Net zero ready development as currently set out in the FH/BS does not address total operational energy of buildings and would omit emissions associated with unregulated energy.</p> <p>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.</p> <p>Encouraging net zero unregulated energy through the policy would not be as strong of a requirement as requiring it.</p> <p>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.</p>	Option
d	<p><b>Accept offsetting of unmitigated carbon emissions associated with operational energy use as a last resort, where measures to reduce carbon on site have been exhausted and with strict principles for how/when this would be accepted.</b></p>	<p>Due to 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.</p> <p>Collection of an offset fund could potentially create a pot of money which could be utilised to deliver</p>	<p>There is evidence from elsewhere that offsetting could be more attractive than delivering onsite measures leading to poorer performing buildings.</p> <p>Offsetting shifts the problem of carbon emissions elsewhere and does not address the real need to deliver truly net zero buildings from beginning.</p>	Option

		carbon reduction measures elsewhere in city (e.g. existing buildings in need of retrofit).	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.	
172	e <b>No local policy on net zero carbon. Rely on national guidance and the upcoming Future Homes/Building Standard which is envisaged to deliver 'net zero ready' development from 2025 onwards.</b>	This option would mean greater consistency for developers building in Oxford with 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. There is potential for future updates to national policy/Building Regs that would address unregulated emissions and embodied carbon.	This approach ignores the local context of Oxford including challenges that constrained sites face and realistic types of development that may come forward. 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 (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.	Option (considered detrimental)

## Embodied carbon

5.10 The carbon associated with buildings in operation is not the only source of emissions that will need to be addressed, however. There is an embodied carbon cost to the materials used in the built environment and the construction,

maintenance, redevelopment and demolition processes. As operational energy becomes zero carbon, the embodied carbon cost of new development will become the primary source of emissions that need to be addressed and it is crucial we begin to tackle this issue directly in the new Local Plan.

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- 5.11 Embodied carbon is an even more challenging and complex aspect of zero carbon design to address than unregulated energy and it is one that the Local Plan 2040 may not be able to influence fully because it is still an area of evolving understanding. But there are opportunities to do more than at present, and to begin to lay the foundations of policies that can be further developed in future years as industry knowledge on the subject matures. It will also be important to ensure that the policy remains flexible to the introduction of national standards that may make local requirements redundant.
- 5.12 There is an opportunity to lay out some key principles for addressing embodied carbon, (which are explored within the net zero background paper and will need to be fleshed out further as we develop a draft policy). For example, encouraging locally produced, natural materials where possible; stressing the importance of thinking about the lifecycle of the building and designing for easy adaptation at end of operational life; as well as the need for minimising site waste and maximising recycling (demonstrating through informed construction waste management plans). Equally, that demolition of existing buildings should be a last resort, and that reuse wherever possible would be preferable in order to retain existing embodied carbon on a site (unless the new design can be demonstrated to be a more sustainable choice). On larger developments, we could go further and require applicants to assess and demonstrate how embodied carbon has been reduced through submission of a Whole Life Cycle Carbon Assessment, however, this may be more challenging for smaller scale proposals. Currently our proposed threshold for requiring this type of assessment would be major applications.

Policy Option Set R2: Embodied carbon				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Include high level principles for limiting embodied carbon, including the importance of retaining existing buildings where possible. Guidance would be expanded upon in</b>	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.	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	Preferred Option

	<b>accompanying technical advice note (TAN)/SPD.</b>	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.	innovation and adaptation to specific context of individual sites and schemes.	
174	<b>b Unless superseded by future updates to Building Regulations (or other national policy). Set more specific requirements would be set out for major development requiring a measurement of embodied carbon during construction through a recognised methodology and demonstrating actions taken to reduce this as much as possible (e.g., completion and submission of Whole Life Cycle Carbon Assessment demonstrating how embodied carbon has been quantified and reduced).</b>	Requiring larger development to measure embodied carbon at the construction stage will allow for improved understanding of embodied carbon 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 which could be expanded upon in future iterations of the local plan as national guidance and understanding on this issue grows.	<p>Assessment methods for measuring embodied carbon in construction can be resource intensive and could be challenging for some smaller scale major development – setting an alternative/appropriate threshold for where these would be required may require further consideration.</p> <p>Demonstrating actions to reduce embodied carbon in major schemes is less prescriptive than setting a fixed maximum target for embodied carbon admittedly. However, specific targets could be challenging to apply considering the complexities of accounting for it in construction process and the evolving nature of guidance/industry knowledge on issue.</p>	Option (in combination with a)
	<b>c Do not include any principles in relation to embodied carbon.</b>	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	Alternative Option (considered detrimental)

		will also not address unregulated/embodied carbon.	
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## Retrofitting existing buildings including listed buildings

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- 5.13 There is a significant need to retrofit the existing built environment to address its impact on the climate, i.e., to add energy saving measures that were not part of the original build. Many older buildings also have potential to be improved and adapted before considering demolition (which has an embodied carbon cost). Existing buildings that rely on fossil fuels for heating, often coupled with poorer energy efficiency than modern standards require, are a considerable source of Oxford's carbon emissions and adapting our buildings to meet the challenges of climate change will need to be addressed if we are to achieve net zero and mitigate our impacts on the changing climate. Equally, retrofitting has a role in facilitating adaptation of buildings to the changing climate and building in resilience to impacts like flooding and heatwaves to protect the health and wellbeing of occupants.
- 5.14 The Zero Carbon Oxford Partnership's Zero Carbon Action Plan contains a roadmap which sets out a series of ambitious targets for retrofitting existing buildings in the city. Following the energy hierarchy, fabric efficiency measures that can help reduce energy demand should be the first intervention when it comes to retrofitting. The roadmap also includes various targets for the incorporation of renewable energy generation technologies like solar panels and heat pumps. It will take a variety of tools and systems to help occupants and owners to upgrade their buildings so that such targets can be achieved. The Local Plan has limited powers in directly driving retrofitting of existing buildings, equally, many retrofit measures can be undertaken without the need for planning permission (permitted development). However, where planning permission is required for such works, it will be important to ensure that we positively support and facilitate these changes where appropriate.
- 5.15 Historic buildings and heritage assets (such as listed buildings and conservation areas) come with an additional set of considerations which need to be carefully thought about and that relate to the preservation of their unique features and styles which contribute to their historic character that makes Oxford so special. The message, however, is that despite these additional challenges, retrofitting *can* be carried out sensitively and successfully whilst preserving their unique historic character and the Council will support this wherever possible. In the new Local Plan there is an opportunity to strengthen this message through incorporating a specific policy which addresses retrofit of existing buildings, including historic ones. We

see this as a chance to bring greater certainty to applicants who wish to pursue such measures, potentially by providing clarity on what measures would be more/less harmful to historic buildings and heritage assets to enable the most appropriate forms of retrofit for their historic context. Listed building consent may also be required where retrofitting is being considered on listed buildings and this will need to be pursued alongside a planning application.

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<b>Policy Option Set R3: Retrofitting existing buildings including heritage assets</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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.</b>	<p>This policy recognises the high priority afforded to the retro-fit need in the city and seeks to ensure that retro-fit measures that require planning permission will be supported wherever possible – particularly where demonstrable benefits for climate (mitigation or adaptation) can be evidenced.</p> <p>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.</p>	<p>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.</p> <p>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.</p>	Preferred Option (in combination with b)
b	<b>In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/energy</b>	This option addresses the retrofit need in the context of historic buildings and heritage assets and recognises the particular challenges present in the need to balance heritage considerations.	Same negatives as for option a as well as the following.	Preferred Option (in combination with a)

	<p><b>efficiency/climate adaptation measures will be considered as benefits that may outweigh harm.</b></p> <p><b>Be explicit in setting out a set of key principles to follow, potentially flagging which measures 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.</b></p>	<p>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 what measures are more appropriate versus those that would be viewed as more harmful in a heritage context; as well as how various levels of harm would be balanced with the benefits (e.g., carbon reduction/climate adaptation) in the decision-making process.</p>	<p>Identifying a strict list of measures that cause less harm will be challenging when character and value of heritage assets and their setting varies. Ultimately, decisions will still have to be made on a case-by-case basis.</p> <p>Listed buildings and other heritage assets are afforded statutory protection which is over and above given through planning controls. Great weight is given to the preserving or not harming the significance of these heritage assets, and this must be born 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.</p>	
c	<p><b>Do not include policy addressing retrofitting of existing buildings and/or heritage assets.</b></p>	<p>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).</p> <p>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 relevant planning issues in the decision-</p>	<p>This would ignore the significant need for pursuing retrofit projects on existing buildings in the city to reduce our carbon footprint.</p> <p>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 avoid the planning system being seen as a</p>	Alternative Option (considered detrimental)

	making process (such as any potential harm to protected heritage features).	barrier to uptake where such measures are planned and require planning permission.	
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## Efficient use of land

5.16 Because of the shortage of developable land in Oxford, it is important that options consider the best way to use that land. Setting minimum densities for housing development helps to ensure land is used efficiently.

**Policy Option Set R4: Efficient use of land**

	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
178	<b>a Have a policy requiring that development proposals 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, and bearing in mind that larger-scale proposals will be suitable in many situations.</b>	This approach would enable applications to be refused if they do not make efficient use of land. However, it also acknowledges that proposals should make an individual design response to site-specific circumstances and surrounding, and that capacity will be guided by the appropriate use for the site.	If density requirements are not set, it may be difficult to demonstrate that best use is not made of the land, hence this option is in combination with b.	Preferred Option (in combination with b)
	<b>b Have minimum density requirements for district centres and the city centre only.</b>	This helps meet the NPPF requirement that should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.	This does remove some ability for there to be an individual response to surroundings that suggests a lower density than the minimum. It may be argued that this does not fully meet the NPPF requirement.	Preferred Option (in combination with a)

c	<b>Have minimum density requirements to cover the whole city, for various types of location such as suburban, gateway, district and city centre.</b>	This would fully meet NPPF requirements. It gives a very good starting point for ensuring efficient use of land and resisting applications that do not achieve it. This approach makes it very clear in terms of what's expected.	A suitable density may have very local variables which cannot be reflected in broad minimum densities. This means densities may need to be set lower than is necessary in most cases, to avoid having too many applications that need to depart from this approach.	Alternative Option
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## Natural resources

- 5.17 The ongoing health and wellbeing of people in the city and the sensitive habitats and species that share this space with us depends upon prudent use of resources and ensuring the protection of water, air and soils. Where new development is not conducted in a careful manner, there are risks of contaminants being introduced the environment that could have negative impacts which need to be avoided. This section contains policy options that are intended to address these risks and ensure the protection of our natural environment. The options set out in this table are supported by the Natural Resources background paper.

## Air quality

- 5.18 The issue of air pollution has a variety of causes, which include tail pipe emissions from transport caused by the burning of fossil fuels, the wearing of tyre and brake pads, and emissions from heating sources within buildings. The pollutants arising from these sources are comprised of various substances including nitrogen dioxide, ozone, and particulate matter (small particles of solids like soot and dust). It is commonly accepted that no level of air pollution is healthy, and the presence of pollutants have a variety of short- and long-term health implications, including causing or exacerbating chronic conditions such as cardiovascular and respiratory diseases, as well as lung cancer, leading to reduced life expectancy and even death. The health concerns are particularly severe for the more vulnerable including the young and the elderly.
- 5.19 The entire city was declared an Air Quality Management Area (AQMA) in September of 2010 in response to the issues around air pollution, and there are also known hotspots where this is a particular problem in the city as highlighted in the

map below. In January 2021, the Council adopted the most recent iteration of its Air Quality Action Plan (AQAP)<sup>2</sup> which sets an ambitious target of meeting a local annual mean (Nitrogen Dioxide) NO<sub>2</sub> target of 30µg/m<sup>3</sup> by 2025, as well as other targets for addressing air quality issues. The options set out in this table related to air quality assessments and standards are supported by the Natural Resources background paper. Reducing emissions generally, particularly through reducing the need to travel by car, is also important to air quality and is at the heart of much of the spatial strategy proposed elsewhere in this document.

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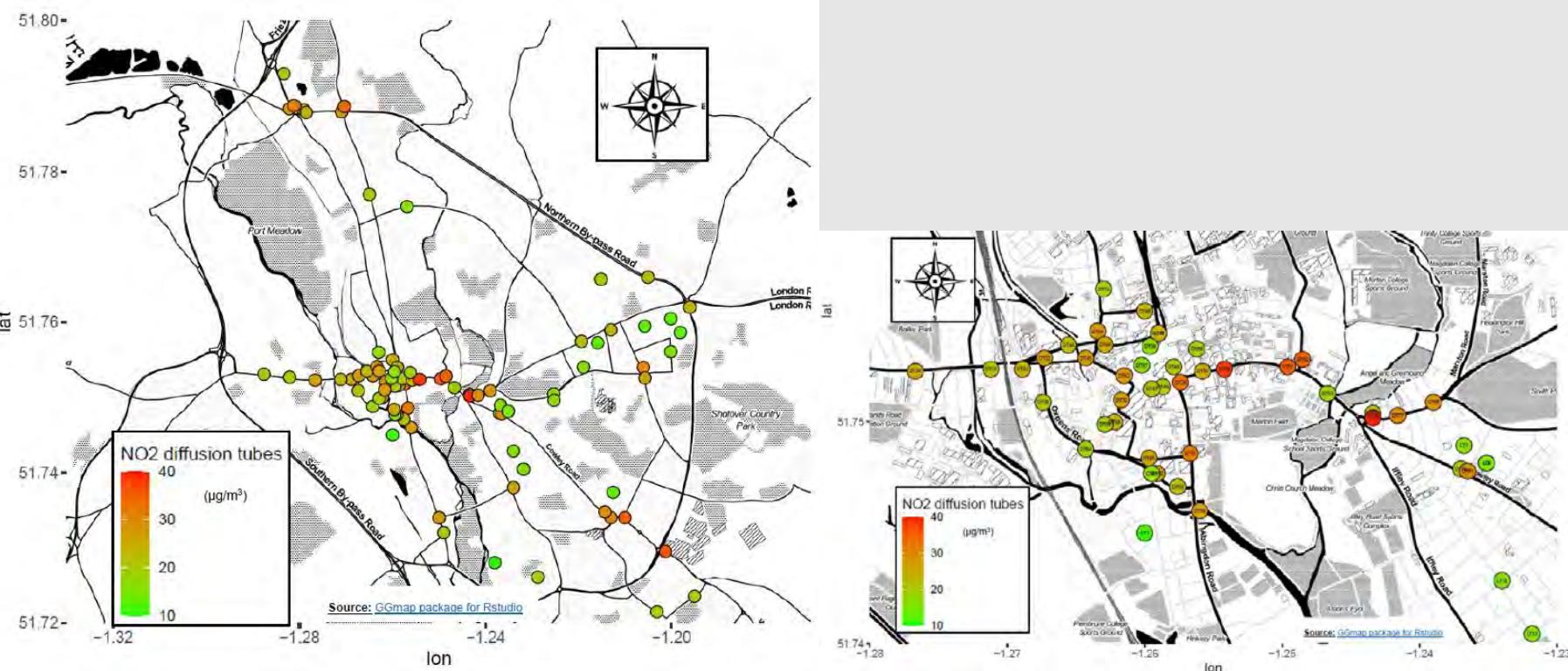


Figure R4: Oxford Air Quality monitoring locations and levels of Nitrogen Dioxide levels (NO<sub>2</sub>) recorded 2021

<sup>2</sup> Air Quality Action Plan (2021-25) [https://www.oxford.gov.uk/download/downloads/id/7428/air quality action plan 2021-2025.pdf](https://www.oxford.gov.uk/download/downloads/id/7428/air%20quality%20action%20plan%202021-2025.pdf)

5.20 It will be important for us to include a policy in the new Local Plan that ensures proposals for new development assess local air quality in certain circumstances, and the development's own impact on air quality. Where there is the potential for negative impact, an appropriate mitigation strategy should be put in place before it can proceed. There is a clear link here with the policy options set out for zero carbon buildings which would prohibit fossil fuel heating (e.g., gas boilers) in new development, restricting these types of systems will help to limit additional air pollution including Nitrogen Dioxide and Particulate Matter, which contribute to poor air quality.

<b>Policy Option Set R5: Air Quality Assessments and standards</b>				
	<b>Option for policy approach</b>	<b>Potential positive consequences of the approach</b>	<b>Potential negative/neutral consequences of the approach</b>	<b>Related options, conclusion</b>
<b>a</b>	<p><b>Air Quality Assessments (AQAs) will be required for all major developments, or any other development considered to have a potentially significant impact on air quality.</b></p> <p><b>Any resultant significant impacts on air quality inside an AQMA must be mitigated. The AQA (Air Quality Assessment) must consider all the different sources of air pollution during operational and construction phases (including but not limited to: transport, heating, dust generated from construction activities, etc).</b></p>	<p>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.</p> <p>The whole of the city was declared an AQMA in September 2010.</p> <p>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 encouragement of active travel options reduces dependence upon use of private cars, the majority of which are currently non EVs.</p> <p>The Air Quality Action Plan (AQAP) has been produced as part of the council's statutory duties and it outlines actions to be taken to improve air quality in Oxford 2021-2025. Key objective is to bring NO<sub>2</sub> emissions into legal compliance as</p>	<p>Additional assessment/modelling requirements for applicants which adds to the information they would need to submit with a planning application.</p>	<p>Preferred Option (in combination with b)</p>

		soon as possible and to go beyond legal compliance.		
<b>b</b>	<b>Require all new major developments within the city's AQMA to comply with the local air quality standard for Nitrogen Dioxide (NO<sub>2</sub>) set out in the city's most up-to-date air quality action plan (currently a target of 30µg/m<sup>3</sup>) and contribute to achieving compliance with the national air quality objectives. This is an additional standard to the requirements in the current local plan. The standard would be tied to any subsequent updates to the target set in the air quality action plan where this is superseded.</b>	This target would set a high standard for accepted Nitrogen Dioxide emissions from all new development in recognition of the rigorous target the Council has set locally within its Air Quality Action Plan. The standard required in the policy would follow the AQAP and where tighter standards are opted for in future, would be mirrored here. The target is currently 10ug/m <sup>3</sup> 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.	Preferred Option (in combination with a)
<b>c</b>	<b>Do not include a policy about air quality assessments but rely on other regulatory regimes.</b>		This option is not considered to be reasonable due to the poor air quality across the city. Relying upon national legislation ignores the Oxford context and the city's ambition to go beyond national targets.	Alternative Option (considered detrimental)

## Water quality

5.21 Oxford has a complex water environment, sitting at the confluence of a variety of water bodies of different scales. The issues of water quality include not only the availability of clean drinking and bathing water, but also the fact that some of our most

sensitive ecological sites also have a particularly important relationship to water, relying on a consistent hydrological environment that is easily impacted by changes in water levels or water quality.

- 5.22 New development has the potential for directly introducing a range of pollutants into water bodies where it is not appropriately mitigated, equally, once in operation, its users can influence nearby water quality through increased demand on water supplies as well as through output of pollutants which can be particularly harmful where this happens close to sensitive catchments. As such, the Local Plan should include requirements that aim to ensure that sensitivities to water are assessed, and that impacts from development are appropriately mitigated. Because water quality can be addressed through a variety of means, we propose to include requirements as part of a couple of key policies located elsewhere in the document (managing impacts of development, resilient design and construction, and sustainable drainage systems principally), as opposed to having a separate water quality policy.

<b>Policy Option Set R6: Water Quality</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Set out a policy approach that incorporates issues around water quality into policies about managing the impacts of development, as well as requiring measures to limit water use (resilient design and construction) and measures to capture surface water runoff and clean this via introduction of Sustainable Drainage Systems (SuDs).</b>	This approach ensures that due consideration is given to maintaining water quality without the need for a separate policy. Water quality is addressed in policy through 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.	This approach means that due consideration of water quality must be secured through a range of other (albeit interlinked) policies. There is potential for this approach to result in this issue being overlooked.	Preferred Option
b	<b>Include a bespoke policy on water quality.</b>	Ensures that water quality is addressed separately in any development.	This could result in unnecessary replication in the Local Plan and additional information being prepared for a proposal	Alternative Option

			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. A separate policy could cause confusion and result in lack of clarity and additional burdens which are not necessarily achieving the desired outcomes.	(considered detrimental)
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## Soil/land quality

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- 5.23 Oxford is a small city with a tightly drawn administrative boundary and contains several physical and policy constraints. This means that developable land is at a premium. It is therefore important to ensure that what land is available is 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.
- 5.24 Due to Oxford's long history of development, 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. It will therefore be important to ensure that the quality of our soils and the stability of the land is protected as well as ensuring that people are not brought into contact with harmful contaminants that may arise from the land we build on, particularly in instances where historic land uses may have left contamination behind. The policy options below are intended to address this risk.

Policy Option Set R7: Land Quality				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Include a policy approach that requires the submission of details of investigations of any site suspected to be</b>	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	Such an approach could limit innovation for land remediation when required.	Preferred Option

	<b>contaminated and details of remedial measures which must then be carried out.</b>	adverse impact on the quality of local groundwater or surface water quality.		
<b>b</b>	<b>Do not include a policy about land quality but rely on national planning policy and other regulatory regimes.</b>		This option is not considered to be optimal as there are many sites with contaminated land across the city and relying on national legislation ignores the local context.	Alternative Option (considered detrimental)

## Amenity and environmental health impacts of development

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- 5.25 Beyond impacts on water, soil and air, new development has the risk of creating a range of wider environmental impacts particularly during the construction process. In a constrained city like Oxford, where new development can be happening near neighbours, amenity impacts can be particularly problematic. Issues arising from new development can range from noise and vibration to the generation of dust and other contaminants. Transportation methods bringing materials to and from site can cause further disturbance. Once in operation, certain types of plant equipment and other ancillary facilities can have noise impacts that need to be fully assessed and mitigated to ensure that new development does not inflict upon future amenity of nearby residents.
- 5.26 Our proposal is to include a policy that would seek to ensure that the amenity of communities, occupiers and neighbours is protected. The policy would also ensure that new development does not have unacceptable transport impacts affecting people and the existing transport network; and where the risk of this arises, that the design provides mitigation measures where necessary. Equally, the policy would seek to ensure that noise and vibration from new development is managed and mitigated where necessary, whilst setting out the need for proposals to have carefully considered the existing noise environment, and presence of potentially noise sensitive sites so that risks of conflict are minimised and mitigated.

Policy Option Set R8: Amenity and environmental health impacts of development options			
Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion

a	<b>Require that new proposals do not result in unacceptable impacts on amenity as a result of noise, nuisance from light, dust, fumes etc. Continue to require that impacts of developments must be mitigated to ensure that the amenity of communities, occupiers and residents are protected.</b>	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.	If this policy were to go beyond the regulations it could be considered an unreasonable administrative burden upon developers and the delivery of new development.	Preferred Option
b	<b>Do not include a policy about but rely on national planning policy and other regulatory regimes.</b>		This option is not considered to be optimal as the impacts of development must be properly considered and assessed to ensure that the health and quality of life of all those who live and work or visit the city are safeguarded.	Alternative Option (considered detrimental)

## 6.0 A city of culture that respects its heritage and fosters design of the highest quality

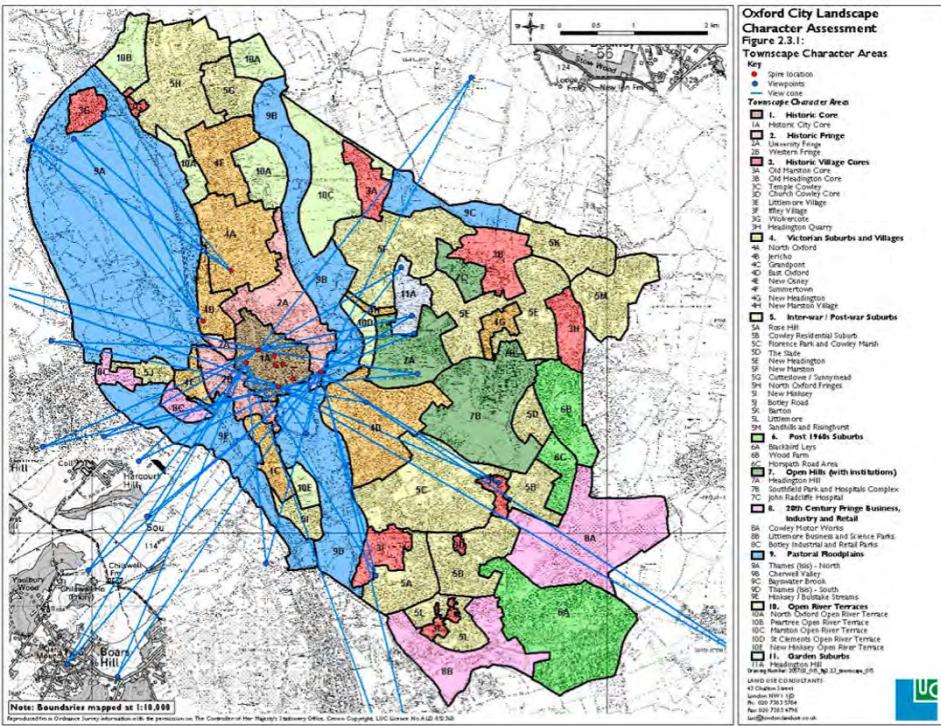
### Introduction and wider context

- 6.1 A key theme of the Local Plan 2040 vision, which addresses both the social and environmental pillars of sustainability, is for Oxford to respect its culture and heritage and foster design of the highest quality. This is underpinned by three key objectives:
- Well-designed, beautiful buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and pass through.
  - Ensure that the significance of valued and important heritage is conserved and that understanding of the value and importance is enhanced;
- 6.2 To respond to this theme successfully, it will be important that we drive the highest quality design in all new development, which means developments are both aesthetically pleasing and functional, in that they enable people to live healthy, happy lives; that they respond to climate change and make space for biodiversity. Oxford is a product of more than a thousand years of evolution, with layers of history both visible and buried resulting in many valuable heritage assets, together and individually contributing to a special character that defines and is particular to the place. Therefore, new development will need to come forward in a way that respects and responds to heritage and archaeology and takes opportunities to celebrate this history. Success will require a balance between meeting the needs for the future (such as providing new homes, greening our streets and meeting net zero carbon) whilst ensuring that change does not harm the important values of these heritage assets so that these can continue to be understood, valued and enjoyed for years to come.
- 6.3 This chapter sets out a range of options for policies falling under two sub-topics, which are:
- Urban design - which includes health impact assessments, designing good quality living environments and specialist housing needs, cycle and car parking
  - Heritage and archaeology
- 6.4 The government has set out its view as to what good design looks like as part of its National Design Guide (NDG), which highlights ten characteristics for high quality design and is further supported by the National Model Design Code. What is clear, is that high quality urban design is about more than just how a building, or a street looks aesthetically, it is also about

ensuring it functions positively for the people who use those spaces. Design done well can help to address a variety of challenges facing our city, for example it can:

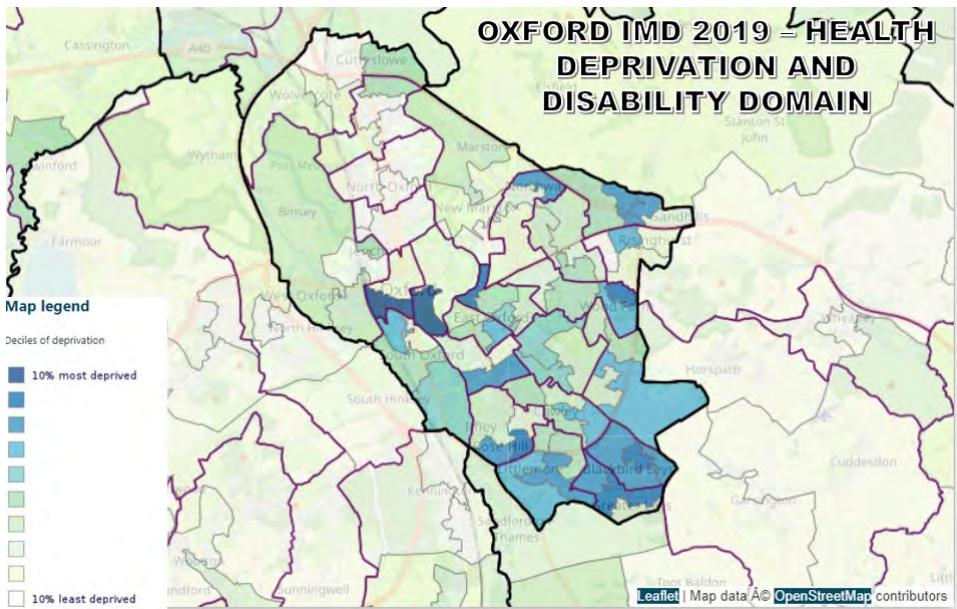
- ensure that issues of health and wellbeing in the local area are considered and that inequalities are reduced rather than exacerbated, such as through providing access to facilities and green space;
- support people to live low carbon lifestyles through maximising walking/cycling opportunities, reducing and managing car parking, increasing cycle parking opportunities, whilst also building resilience to the harmful impacts of climate change by incorporating materials that reduce impacts of flooding or overheating;
- contribute to biodiversity, by ensuring that developments include features that make space for nature.

- 6.5 To meet those broader objectives and to reduce conflicts with the existing environment and nearby uses, good design also needs to consider local context and fit in sympathetically with its surroundings. Oxford has a long history of settlement, and a complex pattern of design styles and townscapes has evolved across the city over centuries, which are highlighted in the accompanying landscape character assessment and summarised in the example map in Figure DH1. This is a good starting point for more detailed assessments as part of local design guides and development briefs as well as for individual sites.



*Figure DH1: A character assessment of Oxford City Landscape, including townscape character areas and Oxford's view cones and view points.*

- 6.6 As well as the important urban design aspect of ensuring good access to facilities and services, which is a key part of the strategy underlying this plan, design of new developments should ensure the health of residents, helping address some of the health inequalities in the city. There is a distinct pattern of socio-economic inequalities across the city, with some of the least deprived and most deprived neighbourhoods nationally located within our boundaries. Linked with this pattern of deprivation is the presence of health inequalities, and whilst many of our residents are in notably good health compared with national average, nevertheless there are incidences of health inequalities across the city.



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*Figure DH2: Index of health deprivation and disability domain, by Lower Super Output Area*

6.7 The following are a range of options for policies which address different aspects of design, and design at different scales.

## High quality design

### Principles of good design

6.8 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. A number of these considerations will be identified and discussed in other parts of the document.

- 6.9 The current Local Plan has utilised a design checklist which sets out key issues that we expect to be addressed as part of any planning application. This was intended to concisely bring together the key matters for an applicant to demonstrate they have factored into the design of their development, and we feel that this is a sensible approach to continue for the new Local Plan, although with the potential to frame the checklist more as a set of expectations than questions, and also to expand it to include a broader range of design considerations, such as impacts on health and sustainable design and construction.
- 6.10 Feeling safe in our local area is important to supporting positive mental health and the way buildings and the spaces in between are designed and laid out can have a role in reducing opportunities for crime and for improving safety from more significant threats such as terrorism. Simple factors such as improving visibility of public spaces like play parks, promoting activity on the street and reducing the amount of 'dead spaces' can all help to deter criminal activity. Harder interventions like use of street furniture can remove opportunities for unauthorised vehicles to move through pedestrian areas, whilst consideration of access and evacuation routes in busy buildings and more confined areas can support response activities during times of emergency. Good urban design will naturally create safer streets.

Policy Option Set DH1: Principles of high quality design of buildings				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Expand and strengthen the current checklist. This would be bolder, so instead of questions to consider it includes statements of what is expected, which must be set out in the Design and Access statement or other submission. It may also be expanded to include other elements of design e.g. healthy places, inclusive design, sustainable design and</b>	Can ensure broader range of developments benefit from good design, can help development schemes be more holistic in positive impacts.	Potential for overlap with other policy areas, which are already addressed in the plan and may result in unnecessary repetition; risk of extending outside the remit of planning.  May be too onerous to apply to apps at minor scale.	Preferred Option

	<b>construction etc. (or these things would be dealt with separately, but they will need to be considered). It will align with the headings of the National Design Guide.</b>		Time/resources to develop these topics, as well as questions on the status of these within development plan.	
<b>b</b>	<b>Continue with present approach of setting out a series of design questions for developers and assessors to consider – 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.</b>	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.	Alternative Option
<b>c</b>	<b>Include householder applications and/or changes of use</b>	Even if there are no significant external changes of use, they may	The impacts on design can be assessed without a checklist for these smaller	Alternative Option (considered detrimental)

	<b>applications in the requirement to follow the checklist.</b>	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.	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.	
d	<b>Retain generic design policy but relax requirements e.g., have requirements for good quality design but do not rely on a checklist.</b>	Potentially more flexibility for developers to bring forward compliant schemes and more quickly.  Easy to compare requirements to NPPF and other authority baselines. NPPF update has more specific direction on delivering high quality design.	It might be difficult to ensure proposals reflect Oxford context.	Alternative Option (considered detrimental)
e	<b>No specific policy, rely on NPPF requirements or National Design Guide as template.</b>	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.	Alternative Option (considered detrimental)

## Area specific design guidance

6.11 A crucial element of good design is to ensure that it is set appropriately within the context of the wider area. There are many contextual factors that can influence the design of a development, from its proximity to protected views, to the presence of heritage assets or conservation areas as well as the general character and townscape features surrounding the site. Our preferred option is to develop specific policies or design guidance/codes for areas of the city with sensitivities or where we expect there to be significant change – this will allow us to focus our guidance to the areas that would merit the greatest attention, whilst the overarching policy set out above (high quality design) would set out guidance for the city.

<b>Policy Option Set DH2: Specific design guidance for areas</b>				
	<b>Option for policy approach</b>	<b>Potential positive consequences of the approach</b>	<b>Potential negative/neutral consequences of the approach</b>	<b>Related options, conclusion</b>
<b>a</b>	<b>Develop design guidance/codes specific to an area or type of development, for example for areas of the city that are particularly sensitive and/or where significant change is expected. There is scope for varying amounts of detail in the local plan, with Supplementary Planning Documents or Design Guides potentially used to add more detail.</b>	Sets standards for high quality design for relevant schemes, reflects importance placed on creating distinct places in planning framework. Provides clarity on design expectations for allocated or strategic sites, supplements site allocation policies so design considerations are covered alongside housing numbers, employment floorspace etc.	May be onerous to produce and may require extensive officer time. May be different expectations and ideals from different sectors of the community and landowners that may be difficult to resolve, although potential advantages of resolving them ahead of planning applications.	Preferred Option
<b>b</b>	<b>No area or development type-specific design guides; rely on NPPF requirements or National Design Guide as template.</b>	NPPF update has specific direction on delivering high quality design and distinct places	It might be difficult to ensure proposals reflect Oxford context. Although there is generic ‘placemaking principles’ this approach would not provide supporting guidance or principles that add to the context of Oxford. It will be more	Alternative Option (considered detrimental)

			difficult to ensure consistent standards and design quality and difficult to emphasise importance of placemaking without specific policy and particularly difficult to avoid unwanted homogeneity.	
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## High Buildings and views

- 6.12 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.

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Policy Option Set DH3: View Cones and High Buildings				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Continue to define the area within a 1,200 metre radius of Carfax tower as the Historic Core Area (shown on Figure DH4 at the end of this document). 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 through the use of stringent appraisals to</b>	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).	Preferred Option (in combination with b and c)

	<b>inform and explain design choices.</b>			
<b>b</b>	<b>Continue to refer to the High Buildings TAN<sup>1</sup> as the key evidence base for deciding appropriate heights, designing higher buildings and appraising applications.</b>	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.	Preferred Option (in combination with a and c)
<b>c</b>	<b>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 design within the view cones to avoid harming the views of the spires.</b>	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 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.	The approach is limited to views from defined viewing points.	Preferred Option (in combination with a and b)
<b>d</b>	<b>Include an absolute height limit in the city centre that does not interfere with the spires.</b>	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	Alternative Option

<sup>1</sup> [https://www.oxford.gov.uk/downloads/file/5085/high\\_building\\_study - technical\\_advice\\_note](https://www.oxford.gov.uk/downloads/file/5085/high_building_study - technical_advice_note)

			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.	
e	<b>Include in the policy details about what is expected in retaining the significance of views out from key points in the central conservation area, specifying some key (publicly accessible) viewing places (St Mary's Tower, Carfax Tower, St George's Tower and the Castle Mound). Note aspects of the views that are of particular significance in the setting of heritage assets, in particular the relationship with the landscape setting of the rivers and the surrounding hills that provide a green backdrop and should be preserved.</b>	This would draw out this important aspect of the setting of heritage assets, giving a policy to use if a case needs to be made that a development would harm views out that are important to the significance of the setting of a heritage asset.	This will take additional resources that might not be available. A policy will not be able to cover such a wide range of potential settings and significance, and things could get overlooked. The significance of views out in the setting of heritage assets is already considered and there is not necessarily a great deal to add in policy.	Alternative Option
f	<b>Set out appropriate heights for different areas of the city.</b>	This would provide a strong degree of certainty for all.	Appropriate heights can change along a street and depend on other features of the design so a blanket height limit that is appropriate even across a small	Alternative Option (considered detrimental)

			area is not possible to identify and may be too high in some locations or limit height unnecessarily in others.	
<b>g</b>	<b>Do not include a policy relating to view cones or high buildings.</b>	This would avoid any implication that only view cones are sensitive to height.	The view cones and high buildings area have worked together over a very long time period to ensure that the views of Oxford's spires have retained their significant character, and this would be threatened without a clear policy approach.	Alternative Option (considered detrimental)

## Public art

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- 6.13 The spaces between buildings which we refer to as the public realm, is an important place for encouraging social interaction, promoting people to mix and meet each other in daily life, reducing isolation and loneliness; this has vital benefits for mental wellbeing. Equally, these spaces can also act as venues for public events and entertainment, as well as providing a positive setting for businesses to flourish. Public art can inject colour and character into an area, making public spaces more interesting and enjoyable to move through and spend time in.

Policy Option Set DH4: Public Art				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
<b>a</b>	<b>Develop a distinct public art policy, with requirement for provision from qualifying proposals (for example public art that contributes to local distinctiveness should be</b>	Further emphasise importance of public art as enhancement of public realm and make it easier for more examples to come through development. Encourages early planning of projects.	Would need coordination with wider council strategies related to arts and culture, may add further level of scrutiny that is beyond officer knowledge and experience. Sometimes there may be more	Preferred Option

	<b>provided on all schemes of 20 dwellings or more (gross) or over 2000m<sup>2</sup>).</b>		pressing needs, or needs for enhancement may be in existing communities rather than new.	
<b>b</b>	<b>Incorporate expectations for public art within the design checklist, but do not have any specific requirement.</b>	This would acknowledge the importance of public art in enhancing public realm and adding local distinctiveness.	References to public art are minimal, they would need to be very general as public art can be so varied. This is the current approach, and it tends to result in no public art being provided.	Alternative Option
<b>c</b>	<b>Make no reference in policy, or have no specific design policy, and rely on NPPF requirements.</b>	The NPPF and other national guidance is likely to cover all aspects of design and it may be difficult to justify having this specific requirement in Oxford in addition.	It might be difficult to ensure proposals reflect Oxford context, no specific requirements in relation to public art in NPPF so it might be difficult to properly assess proposals.	Alternative Option (considered detrimental)

## Design of bin and bike stores and external servicing features

6.14 Contributing to the functionality element of new development, high quality design needs to support people to live sustainably in their homes and the places they go to work. The design of new development can enable people to reduce their waste and recycle more through ensuring that there is ample space for bin storage. Equally, and crucial to supporting the shift to a net zero carbon city, is the need for supporting people to travel via low/zero carbon methods, a key element of this is providing space for secure cycle storage so that they can travel by bike around Oxford.

<b>Policy Option Set DH5: Bin and Bike Stores and external servicing features</b>				
Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion	

	<b>a</b>	<b>Requires that bike and bin stores and external servicing features should be considered from the start of the design process and set criteria to ensure they meet practical needs 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.</b>	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 (see bicycle parking standards options below).	Adding further burden to developers in bringing forward schemes; may be too onerous to apply or enforce.	Preferred Option
	<b>b</b>	<b>No specific policy, rely on NPPF.</b>	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.	Alternative Option (considered detrimental)

## Bicycle and motor vehicle parking design standards

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- 6.15 If Oxford is to achieve its ambitions to improve air quality, reduce congestion, enhance public realm and encourage healthy lifestyles, there is a need to prioritise road space and promote the sustainable modes of travel: walking, cycling and public transport. Setting the right level of parking standards can positively influence urban design outcomes, ensure the most efficient use of land and encourage residents to consider alternative options to using a private car. New developments need to consider firstly if private car parking needs to be provided or whether the development could be car free. Oxford's compact nature means that people can move around on foot, bike or bus and not be totally dependent upon owning a car. However, if residents and employees are being encouraged to switch modes away from the private car to walking, cycling and the use of public transport and car clubs these need to be realistic alternatives. For example, the rise of E bike ownership means the need for secure bike parking to be provided in residential, employment areas and the city and district centres is an important consideration in the design of the public realm.
  - 6.16 A potential unintended effect of low car or no car development could be that parking is displaced to surrounding streets which do not have parking restrictions. Controlled Parking Zones (CPZs) prevent this happening. CPZs are implemented by Oxfordshire County Council and the programme for this roll out is discussed and agreed with officers and members at the city council. Car free developments outside of CPZs would be problematic because of the displacement of parking.
  - 6.17 The Preferred Options recognise the need for some on and off-street public parking in Oxford to meet the needs of those using the city and district centres. However, to achieve the level of modal shift needed across the city to combat congestion and poor air quality there needs to be a downward pressure upon public car parking provision city wide. Throughout the plan period, [Oxfordshire County Council](#), as the highways authority, is proposing changes to the movement of vehicles around the city through several demand management measures including traffic filters, an enlarged zero emission zone and the introduction of a work place parking levy. As these changes take place there is an expectation that the levels of public parking, particularly on-street parking, may continue to be reduced or reorganised to support the efficient flow of vehicles particularly buses and to reclaim road space for the benefit of cyclists and pedestrians. These redesigns must give appropriate consideration parking for disabled drivers which is both practical and well designed.

	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Require high levels of secure bicycle parking (e.g. at least 1 space per bedroom, 1 space per 5 staff) either indoors or external for residential and non-residential schemes to achieve best design outcomes.</b>	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.	Preferred Option (in combination with b)
b	<b>Set some more specific requirements for the type of bike 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 cycle parking and ensure that</b>	More specialist types of bike are increasingly common and open cycling to a wider range of people. They also have more complex storage and charging requirements which won't necessarily be met if the requirement for them is not set out clearly. Although showers are currently required for offices over 500m <sup>2</sup> and most other non-residential uses over 2500m <sup>2</sup> this	This adds an extra requirement for space and potentially cost, which may compete with other requirements.	Preferred Option (in combination with a)

	<b>showers and lockers are provided to support staff.</b>	approach encourages more provision for cyclists.		
c	<b>Lower the standards for cycle parking residential and non-residential) from existing levels.</b>	<p>There is no loss of amenity space or indoor living space. This approach would help to reduce build costs for the scheme.</p>	<p>If insufficient or poorly designed 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.</p>	Alternative Option (considered detrimental)

Policy Option Set DH7: Motor vehicle parking design standard				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<p><b>Seek car free residential development across the city, subject to criteria to ensure accessibility to public transport and local shops, and low car in locations not suitable for car free.</b></p> <p><b>Car free would mean no spaces allocated to a house, but parking would be available to meet disabled and operational needs, for car clubs and potentially for those who can demonstrate a need for a personal vehicle for work that needs to be parked near home (potentially in a designated area within the site) (work vans, health visitors for example). Consideration will be given in the policy to setting a threshold for different levels of car free, because the larger strategic sites (over 50 units) have more scope for successful carpooling and more space for essential vehicles.</b></p> <p><b>The policy will set design guidance to ensure the parking</b></p>	<p>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 will encourage people to walk and cycle as they will feel safer, and parents will feel more confident allowing their children to cycle or walk if there is less traffic on the roads.</p> <p>Supports the use of car clubs across the city. Supports the most efficient use of land, opportunity to create well designed external spaces, reduces congestion as less people travel to these locations in private cars.</p> <p>Low car developments can give proper and adequate consideration as to where the parking would be located to ensure good design is delivered.</p>	<p>Although sites are low car or car free it could result in parking being displaced to other streets which are not restricted if enforcement measures are not enforced and in the absence of a city wide roll out of controlled parking zones (CPZ). In some parts of the city outside of the centres there are insufficient realistic alternatives transport options other than using a private car.</p> <p>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 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</p>	Preferred Option (in combination with b)

	<p><b>provision makes the most efficient use of land, is landscaped, and allows for car free street design.</b></p> <p><b>The approach to car free development would be assessed against whole plan viability as set out in Strategic Policy Option S4.</b></p>		<p>risk being excluded from housing that might best meet their needs, if no car schemes become predominant in new housing developments.</p> <p>Having no car parking provision for larger family dwellings for sale may depresses the market value of these homes, which may impact on the viability of schemes, and the ability to deliver more affordable housing, especially if the space freed up from the lack of parking does not enable enough development to compensate.</p>	
<b>b</b>	<p><b>Do not allow any additional parking on non-residential sites which are proposed for redevelopment. Seek a significant reduction where there is good accessibility to a range of facilities.</b></p>	<p>Supports the more efficient use of existing parking provision. A comprehensive travel plan should be submitted that incorporates sustainable travel options.</p>	<p>The inadequate provision of parking at a site could lead to displaced provision to nearby streets creating parking stress elsewhere if there is no CPZ in operation across these areas.</p>	Preferred Option (in combination with a)
<b>c</b>	<p><b>Require all new development to be car free across the city.</b></p>	<p>Car free development would mean less land is used for car parking resulting in more amenity space in new developments, it would help reduce congestion and pollution in the city.</p>	<p>Car free developments could result in parking stress in other areas if not properly enforced.</p>	Alternative Option

d	<b>Adopt low car but not car free parking standards. These could still vary by accessibility of the area of the city. These could be the same level of parking standards as for the rest of Oxfordshire, or potentially reduced from this but not car free, for example 1 car per 2 homes and additional parking for new non-residential developments.</b>	Ensures that the design of car parking is properly considered and encourages private car ownership.	More land would be used for parking and there would be more cars in the city adding to congestion, air and noise pollution.	Alternative Option (considered detrimental)
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## Creating healthy living/working environments that are adaptable for the future

### Privacy, daylight and sunlight

6.18 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.

Policy Option Set DH8: Privacy, daylight and sunlight				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion

	<b>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 considered alongside shading and overheating impacts.</b>	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.	Preferred Option
<b>b</b>	<b>Include a policy with requirements to ensure adequate daylight, privacy and sunlight to new residential developments.</b>	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.	Alternative Option
<b>c</b>	<b>Do not include a policy on privacy, daylight or sunlight for any type of development.</b>	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	Alternative Option (considered detrimental)

			daylight or privacy to neighbouring development to an unacceptable level.	
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## Internal space standards for residential developments

- 6.19 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 need for this has been further reinforced by the pandemic. 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 and undermines the national aim that "everyone should have access to a decent home". The government introduced a national described spaced standard in March 2015<sup>2</sup>. The City Council adopted these standards as reflected in the current Oxford Local Plan Policy H15. The standards apply to self-contained dwellings. Separate standards exist for HMOs, but these do not need to be introduced in a local plan policy in order to apply (unlike the nationally described space standards).

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Policy Option Set DH9: Internal space standards for residential developments				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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 areas of corridor or lobby space.</b>	Following the Nationally Described Space Standards should ensure that developments maximise the useable space within housing through functional layout and provide scope to modify layouts for future needs. Design of developments can be important in helping people avoid social isolation and loneliness. In	Oxford is so constrained 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	Preferred Option

<sup>2</sup> [www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard](http://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard)

		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.	repeated or contradicted in local plans).	
<b>b</b>	<b>Don't include a policy on internal space standards (if the national standards are not adopted locally then they do not apply).</b>	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 unacceptable in terms of internal space and doesn't offer occupiers the appropriate level of space.	Alternative Option (considered detrimental)
<b>c</b>	<b>Include a policy but don't follow the Nationally Described Space Standards.</b>	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.	Alternative Option (considered detrimental)

## Outdoor amenity space

6.20 The adequate provision of outdoor amenity space is important as it supports the physical and mental health and wellbeing of residents, allows clothes drying outside (which uses less energy and prevents condensation issues), contributes to

biodiversity, provides shade and limits urban heat-island effects and with good design of permeable surfaces can contribute towards flood risk management. 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. Designs must strive to deliver the highest quality of outdoor spaces to ensure people's health and wellbeing are prioritised. Important design considerations should ensure that public and private space is clearly delineated through landscape design and avoid signage. The orientation of the external spaces should seek to ensure there is daylight and sunlight. Communal areas should be designed with places to sit, play, have planting to provide shade and provide both hard surfaces that do not used non-permeable materials, and planted areas. The maintenance of these communal areas needs careful consideration which should be reflected throughout the landscape design.

<b>Policy Option Set DH10: Outdoor amenity space</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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.</b> <b>Include a requirement for outdoor areas where neighbours can meet or interact.</b>	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.	Preferred Option
b	<b>Include a policy that sets out broad principles required for amenity space for housing but no size requirement.</b>	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.	Alternative Option

	<b>c Set a requirement for outdoor amenity space for larger non-residential developments.</b>	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.	Alternative Option
<b>d</b>	<b>Do not set requirements for non-residential amenity space.</b>	Less restrictive and flexible.	Could result in limited or no provision.	Alternative Option
<b>e</b>	<b>Do not set requirements for residential amenity space.</b>	Less restrictive and flexible.	Gives no certainty about the provision of amenity space which contradicts all the evidence about how valuable it is for people to enjoy the outdoors and the priority for development to be designed to provide such spaces is key.	Alternative Option (considered detrimental)

## Accessible and adaptable homes

6.21 Housing provision across the city needs to ensure that it meets the needs of everyone whatever age and stage of life. The council wishes to ensure that these new homes are accessible to all including visitors and those with disabilities. As such, it is important to consider the demands and requirements people will have from their homes and how this may well change over time. 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. Ensuring all new homes are adaptable is also a more efficient use of resources as a home that is adaptable will have a longer functional life.

- 6.22 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. 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.
- 6.23 The government introduced an optional Building Regulation requirement in '*Approved Document M: access to and use of buildings*' in March 2016. 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.

<b>Policy Option Set DH11: Accessible and adaptable homes</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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 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.</b>	This approach future proofs the housing stock.	The standards can be too onerous and impact upon site viability.	Preferred Option (in combination with b)
b	<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</b>	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	This may encourage low-rise flats, or one bed houses, to circumvent the policy, which may often be not the most efficient use of land or the most suitable design for the area.	Preferred Option (in combination with a)

	<b>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.</b>	practical reasons that limit the amount of accessible and adaptable homes that can be provided.		
c	<b>No specific policy, rely on NPPF requirements or National Design Guide as template.</b>	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.	Alternative Option (considered detrimental)

## Healthy Design and Health Impact Assessments (HIAs)

- 6.24 The health and wellbeing of residents is an important priority for the council and the recent pandemic has highlighted the need to recognise the important link between the natural and built environment and long-term health and well-being and mental health outcomes. An environment which supports and encourages people to feel happy and healthy requires high quality urban design which should include easy access to public open spaces where people of all ages can meet up for a walk, chat, to play games and undertake physical activity. Good design should facilitate the use of active modes of travel, such as walking and cycling; it should also consider how impacts of current and future climate change could negatively impact health (e.g. more heat wave events) and build in adaptive measures that improve resilience to reduce these negative impacts.
- 6.25 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 we would propose to continue to require HIAs in this manner, although there are other alternatives for when we would require HIAs to be undertaken as we have set out in the options table below.

<b>Policy Option Set DH12: Healthy Design/Health Impact Assessments (HIAs)</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Require an HIA for all developments over a certain size-for example for major developments (as currently)<sup>3</sup>. This requirement could be integrated with others such as demonstrating resilient design and constructure.</b>	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 burden on developers, and on those assessing applications.	Preferred Option
b	<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.</b>	More development is subject to an HIA, which ensures issues are properly considered and addressed at an early stage of the development.	This could result in creating a more onerous process with no clear reasons or benefits.	Alternative Option
c	<b>No specific policy, rely on NPPF.</b>	Less burden on developer who will cover off the points in an HIA as part of the application process.	Not having policy makes it harder to have a consistent metric to assess schemes.	Alternative Option (considered detrimental)

<sup>3</sup> (Major development as defined in the The Town & Country (Development Management Procedure) (England) Order 2015.

## Heritage and archaeology

6.26 Oxford's historic environment makes a significant contribution to the character and culture of the city. It is the setting for buildings spanning every major period of British architectural history from the 11th century onwards. There are 18 conservation areas within the city and around 1,500 listed buildings, with the proportion of grade I and II\*, as well as 10 scheduled monuments and 15 registered Historic Parks and Gardens. We also have a rich archaeological heritage extending from prehistoric times to the modern day which encompasses a wide variety of asset types.



Figure DH3: Infographic of heritage and conservation in Oxford.

- 6.27 This vast number and wide range of historic assets in Oxford reflect the city's rich history and special character. It is important to deliver new development in a way that respects and complements this rich history. National policy sets out strong protections for heritage assets as are detailed in the urban design and heritage background paper. Once historic features like listed buildings and scheduled monuments are lost, they cannot be replaced, and as such, the most special assets that contribute to Oxford's historic environment need to be protected from harm that may be caused by inappropriate development so that they can be enjoyed by future generations. The presence of historic features should be viewed as a strength. It can contribute to the distinctiveness of a place, connect occupants with the history of the local area and establish a strong setting for development. Historic buildings need to be repaired and adapted to meet changing needs of occupants, just as with any other building, and it is important that this is carried out thoughtfully and in a manner that preserves the important features of the building or heritage asset that contribute to its significance, the reason why it is protected. The emphasis of the plan must be on the positive management of change, reflecting the city's capacity to move forward while acting as a responsible custodian of the city's irreplaceable heritage. This issue is particularly relevant in relation to the pressing need in the city to reduce carbon emissions in response to the threat of climate change and the consequent adaptation of historic buildings through application of retrofitting measures. In chapter 5 we have included a set of options which highlight our support for these types of applications, providing clarity on how best to approach this in the particular context of historic buildings.
- 6.28 The policy options below seek to set out a framework for how we will require applicants to prevent, assess and mitigate harmful impacts of development on heritage assets and archaeology.

### Designated heritage assets

- 6.29 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.

Policy Option Set DH13: Designated Heritage Assets				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Include a policy relating to designated assets that reflects the NPPF, that sets out how impacts on designated heritage assets will be assessed, 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.</b>	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.	Preferred Option
b	<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 Oxford-specific detail in relation to harm and benefits.</b>	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 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	Alternative Option

			largely repeating national guidance is unnecessary.	
c	<b>No specific policy, rely on NPPF requirements or National Design Guide as template.</b>	NPPF update has specific direction on delivering high quality design, 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.	Alternative Option

## Local Heritage Assets

- 6.30 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.

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Policy Option Set DH14: Local Heritage Assets				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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.</b>	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.	Preferred Option

<b>b</b>	<b>No specific policy, rely on NPPF requirements or National Design Guide as template.</b>	NPPF update 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.	Alternative Option (considered detrimental)
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## Archaeology

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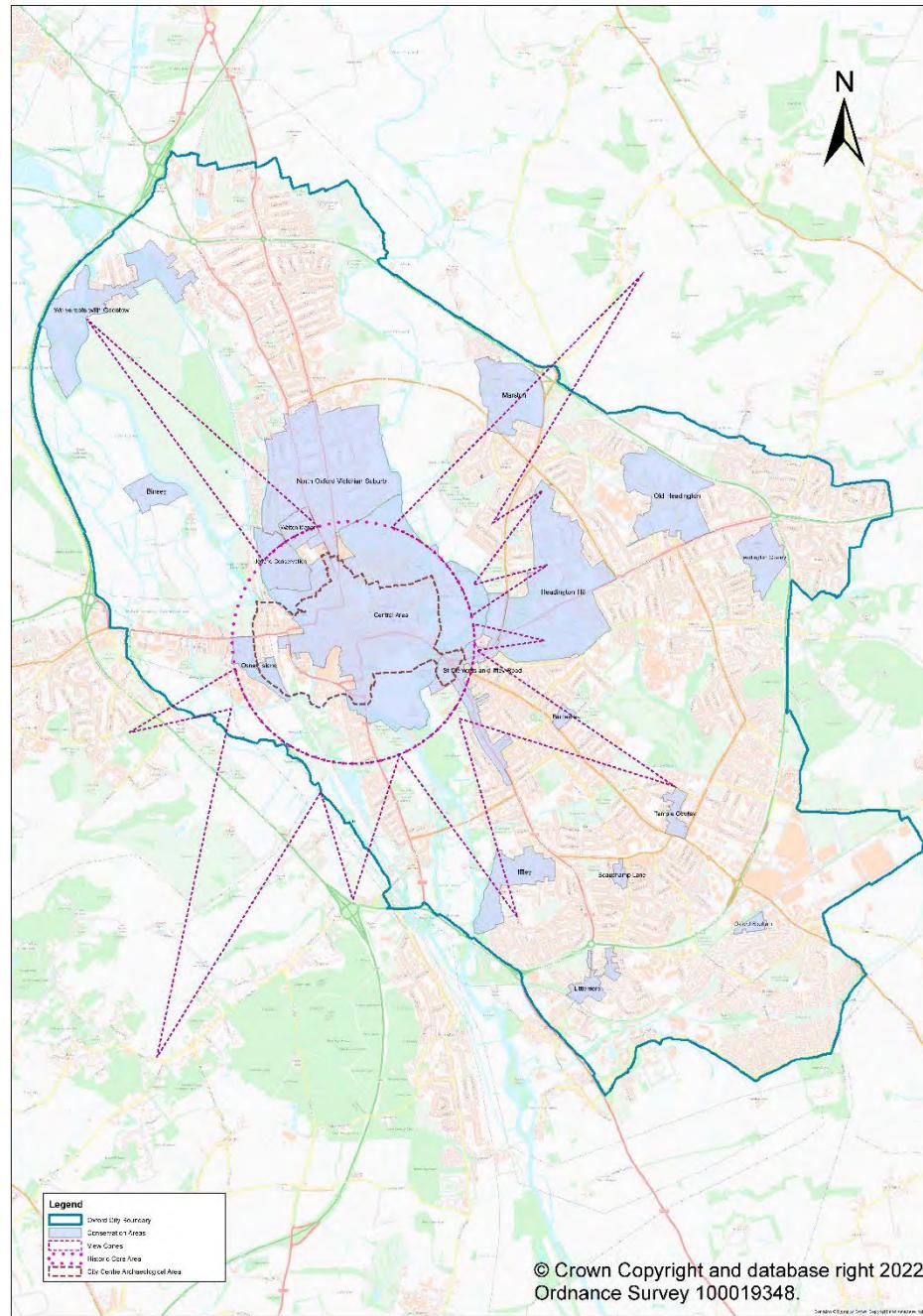
- 6.31 Just as with its built environment, Oxford has a rich archaeological heritage that has been progressively built up from prehistoric times to the modern day. This archaeology has the potential to aid understanding of our heritage. New development presents opportunities to unearth and discover new 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.
- 6.32 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.

Policy Option Set DH15: Archaeology Options				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
<b>a</b>	<b>Continue to define the City Centre archaeological area (shown in Figure U4 below) and require sufficient information to define the character, significance and extent of such deposits including a</b>	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	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	Preferred Option (in combination with b, c and d)

	<b>heritage assessment and full archaeological desk-based assessment if the initial assessment suggests this is relevant.</b>	the start of the process would help to bring certainty.	need to ensure it was made clear that there is potential for archaeological deposits across the city.	
<b>b</b>	<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).</b>	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.	Preferred Option (in combination with a, c and d)
<b>c</b>	<b>Require that wherever archaeological deposits or features are suspected to be present that sufficient information is provided to define the character, significance and extent of such deposits including a heritage assessment and full archaeological desk-based assessment if the initial</b>	This sets out from the start exactly what is expected which aids certainty for developers.	This adds length and detail to the policy.	Preferred Option (in combination with a, b and d)

	<p><b>assessment suggests this is relevant. Where development would impact on archaeological features and deposits it will only be supported where the harm can be eliminated, or where there is clear and convincing justification that the benefits outweigh the harm.</b></p>			
d	<p><b>Where proposed development would impact on archaeological 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 and the significance of the archaeological asset better revealed and understanding of that significance enhanced (by agreed measures).</b></p>	<p>This follows the NPPF approach so adds clarity that this would be expected. If the other parts of the NPPF approach are to be in a policy tailored to Oxford then it would be confusing not to include this also.</p>	<p>This adds length and detail to the policy which may not be necessary as it is at least partly covered in the NPPF.</p>	<p>Preferred Option (in combination with a, b and c)</p>
e	<p><b>Map more areas as archaeological areas where it is known there are likely to be deposits /note allocated sites where archaeological deposits or features are expected to be present and require heritage</b></p>	<p>There are other known areas of deposits, although none to the extent of the city centre. We could define these on the policies map these to help flag the high likelihood of deposits in these areas, which would ensure they weren't overlooked and would add certainty</p>	<p>These 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.</p>	<p>Alternative Option</p>

	<b>assessments with potential desk-based assessments if needed.</b>	for developers from the start of the process.		
f	<b>Do not include a policy about archaeology but rely on national policy instead.</b>	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.	Alternative Option (considered detrimental)



*Figure DH4: showing the view cones, historic core area, conservation areas and the city centre archaeological area*

## 7.0 A more equal and inclusive city with strong communities and opportunities for all

### Introduction and wider context

7.1 The Covid-19 pandemic has highlighted to us the importance of having a variety of facilities in our local area to meet our daily needs. We expect that strong local communities with facilities, services and green spaces in their proximity will continue to be something people value highly. Developing the principle of concentrating development in district centres, we are now using the widely recognised term 15-minute city. The idea of the 15-minute city is one where we seek to ensure everything needed to live well can be accessed within 15 minutes by walking or cycling. Access to facilities for health, fitness and leisure, shopping and work helps to ensure that people's basic health needs are met without having to travel large distances. As was noted in the vision and strategy chapter, we have undertaken analysis of 15 minute walking distances from the district centres and have identified that whilst much of the city falls within 15 minutes' walk of a district centre, there are areas that fall outside of these areas. We have also undertaken the same analysis for local centres, and whilst these typically host a smaller range of facilities, they help to fill in some of these gaps in access to district centres making them important to protect in their own right. The 15 minute walking distances from these centres are set out in figure C1 below, whilst the boundaries for the centres themselves, which we propose to protect within the options in this chapter are set out in figure C2 below.



*Figure C1: 15 minute walking distances from City and District Centres (left) and Local Centres (right)*

- 7.2 The city has an ongoing challenge to improve air quality and cut carbon emissions from the transport sector, as well as reducing the volume of traffic and the need for land to be used for parking. Supporting people to shift away from reliance on private vehicles will be essential to achieving this goal. Walking, or use of a mobility aid on the pavement, is done almost universally, and good access by walking is the number one priority. Cycling is also an active travel mode without air quality impacts, and it enables people to travel further, particularly with the increasing development and popularity of e-bikes and cargo e-bikes. Public transport is vital in Oxford, allowing people to access the city from outside and to move around the city to facilities easily; people would not generally expect to have facilities such as hospitals, theatres and cinemas in walking distance, but good bus access to them helps reduce the need to drive by car. Protecting facilities locally and at public transport hubs, so that people can access them quickly and easily without the need to drive, will help to achieve the objective of reducing car use and also promoting healthy lifestyles and strong communities.

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## Supporting the District centres and the city centre

### Maintaining vibrant centres

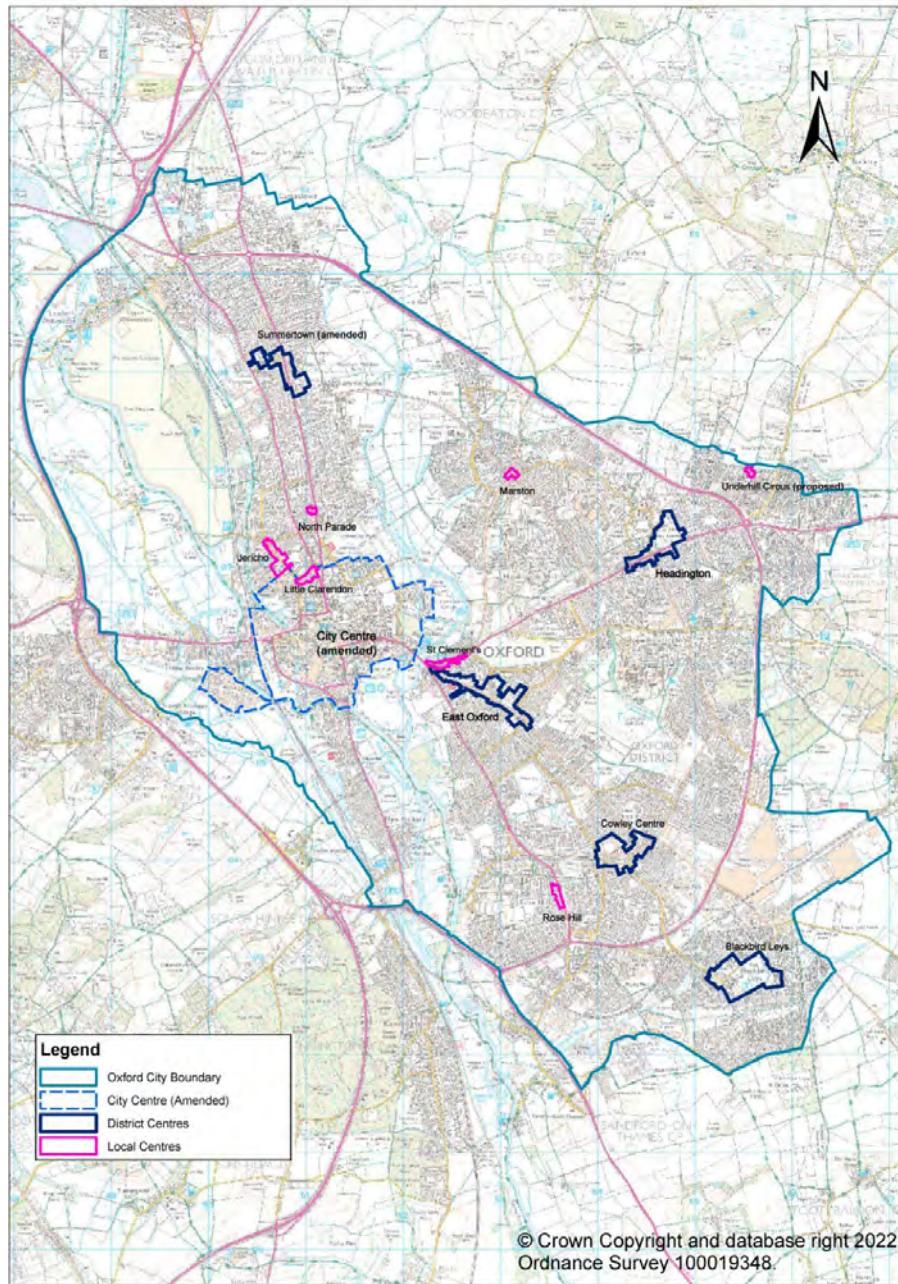


Figure C2: City, District and Local Centres

- 7.3 A challenge for the local plan will be how we guide the changing structure of our high streets and shopping areas in the face of changing shopping patterns and the recovery from the pandemic. Recent changes to the national Use Class Order made by the Government, a traditional means of controlling the proportions of land uses like retail, offices and takeaways, means that the planning system now has less control over what these spaces look like, thus we will establish strong visions for the future of these areas and to utilise a variety of tools to help them develop sustainably into the future. A wide variety of commercial, businesses and services uses are now in the Use Class E, which includes retail and also cafes, restaurants, offices, indoor sport and fitness and GPs. Change within these uses is not classed as development, so does not need planning permission.
- 7.4 Supporting local and independent businesses and start-ups is also important for establishing local identity and supporting the wider economy of the city. Encouraging and protecting a range of uses to set up alongside retailers, like food and drink establishments and cultural and entertainment venues, is a positive way of supporting our high streets to stay lively throughout the day and into the evening. Open spaces and greening also play a role in supporting the economy of the city, acting as venues for larger gatherings like markets and entertainment events, as well as for promoting feelings of community and wellbeing. An attractive public realm, that allows room for outdoor socialising and attracts people to linger, is important to the success of district centres.

<b>Policy Option Set C1: Focusing town centre uses in our district centres</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Define the district centres as on the map above as areas that are highly accessible and include a broad range of facilities including shops, hospitality, community and leisure facilities. These include:</b> <b>City centre</b> <b>Blackbird Leys</b>	This supports the city centre and district centres and encourages them to be placed at the heart of their communities. This promotes sustainable travel, supporting the 15-minute cities concept by ensuring that facilities are focused in these locations that can be easily reached by sustainable modes and allowing various	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	Preferred Option (in combination with b and c)

	<p><b>Cowley Centre Cowley Road Summertown Headington</b></p> <p><b>Identify the character of each area, strengths and weaknesses, and provide design guidance to ensure new developments enhance the character and attractiveness of these areas to encourage people to visit and linger and a sense of belonging.</b></p> <p><b>Allow new Use Class E uses in the district centres, including:</b></p> <ul style="list-style-type: none"> <li><b>Retail, cafes and restaurants</b></li> <li><b>Leisure and entertainment and indoor sports uses (e.g. gyms, leisure centres)</b></li> <li><b>Health centres, GPs and clinics</b></li> <li><b>Offices;</b></li> </ul> <p><b>Also allow:</b></p> <ul style="list-style-type: none"> <li><b>Community facilities (see options below), residential including student accommodation (where compliant with any policy on active frontages);</b></li> <li><b>Visitor attractions</b></li> <li><b>Hotels</b></li> </ul>	<p>needs to be fulfilled in one trip, encouraging people to stay longer.</p>	<p>active frontages, below, will be important in mitigating this.</p>	
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	<b>Flexible work-spaces, co-working spaces and live-work units.</b>			
<b>b</b>	<p><b>Define local centres to include those on the map above, to ensure protection of facilities within 15 minutes' walk, which are:</b></p> <p><b>St Clement's, Walton Street and Little Clarendon Street, High Street east, Rose Hill, and Underhill Circus (not previously designated as a local centre).</b></p> <p><b>Allow new Use Class E uses in local centres, including:</b></p> <ul style="list-style-type: none"> <li><b>shops, cafes and restaurants</b></li> <li><b>Leisure and entertainment and indoor sports uses (e.g. gyms, leisure centres)</b></li> <li><b>Health centres, GPs and clinics</b></li> <li><b>Offices</b></li> </ul> <p><b>Encourage flexible work-spaces, co-working spaces and live-work units.</b></p> <p><b>Do not allow student accommodation, hotels or visitor attractions (Sui Generis uses including cinemas, concert halls, dance halls).</b></p>	<p>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 15-minute access. These locations are less likely to be transport hubs and are more tightly woven into residential areas, so they are not as suitable for hotel uses, visitor attractions and student accommodation, so focus on allowing class E uses is most appropriate.</p>	<p>These local centres vary in character. Allowing new E Classes means that restaurants and gyms could be introduced into quieter areas and they may attract more people than can easily access the centres.</p>	<p>Preferred Option (in combination with a and c)</p>

c	<p><b>Include a policy that sets out a sequential approach for locating new town centre uses based on: centres (city, district and local) first, then edge of centres and only out-of-centre locations where no alternative sites are available. Applicants would be required to demonstrate how they have applied the sequential approach if they are proposing town centre uses outside the centres, looking at edge of centre first.</b></p> <p><b>Include criteria that will be used to assess applications for town centre uses outside of the existing centres, including accessibility by public transport, that negative impacts on the road network can be mitigated, that there is no harm to adjoining land uses.</b></p> <p><b>Require an impact assessment for retail and leisure proposals outside of centres (currently required for those of 350m2 or</b></p>	<p>Town centre uses attract a lot of people and they therefore need to be located in accessible locations (public transport hubs) and preferably in a cluster so 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 community centres, helping them thrive.</p> <p>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). It limits the potential for town centre uses to be located in locations that may draw people away from established centres, for example out-of-town retail generally served by car.</p>	<p>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.</p>	<p>Preferred Option (in combination with a and b)</p>

	<b>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 transport.</b>			
d	<b>Do not include a policy that sets a sequential approach requirement or criteria for town centre use proposals outside of centres.</b>	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.	Alternative Option (considered detrimental)

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## Active frontages

- 7.5 Previous local plans have defined retail frontages to protect the retail function of centres, and along these frontages a certain proportion of retail must be maintained, or changes of use will not be approved. However, changes to the use class order have meant that there is no longer a 'retail' use class. Instead, Use Class E covers the broad range of 'commercial, business and services uses' and within that list there can be free change, for example from shop to office to clinic, without the need for planning permission. This reflects the fact that the nature of retail centres is changing as more shopping takes place on-line. In addition, Use Class E can also change to residential with only a prior approval application rather than full planning permission being required. However, the need for a range of services, for meeting places and for the social aspect of centres remains strong. Each centre in Oxford may have different strengths and needs, which can be acknowledged with individual sets of development principles for each centre. However, for all centres, retaining active frontages, whereby there is activity along a street length and venues for social interaction, will be key to their continued success.

- 7.6 Within the city centre and our district and local centres, shops make a significant contribution to the character of the local area, and the design of shopfronts can have a significant impact on the experience of walking through these spaces. As such, the design of shopfronts is an important concern and one that the Local Plan should try to guide and influence positively. This is particularly important where shopfronts are an important part of the character of a place or contribute to the significance of a heritage asset.

<b>Policy Option Set C2: Active frontages</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Designate frontages in the city centre and all district 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.</b>	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.	Preferred Option (in combination with b)
b	<b>Set criteria for what is expected in a ground floor frontage to bring activity and vibrancy to centres in terms of design and uses. Set criteria for assessing the impacts of design, positioning, materials, colour, proportion and illumination on assets with</b>	This would be applicable whatever changes to the Use Class Order may occur. Criteria help to ensure that shop fronts contribute to the design and character of existing buildings and their surroundings. It provides a framework for avoiding visual pollution and clutter and thus would be a positive policy approach. It gives protection to Oxford's historic shopfronts, including further	This approach will still only be applicable if a planning application is required (i.e. a change of use to residential may be possible without full planning permission, and it would therefore not be necessary to show how there would remain an active frontage). This approach does not necessarily protect town centre uses in the	Preferred Option (in combination with a)

	<b>heritage significance or visual or residential amenity. To continue to support this with further detail in a technical advice note.</b>	advice in a technical advice note, which means that a broader range of topics can be covered than in a policy, and this also avoids being too prescriptive in a policy.	centres, where they are most appropriate and where it is beneficial that they remain. Policy wording is broad, with overarching principles that may not address specific design quality issues.	
c	<b>Designate frontages but do not require a proportion to remain as commercial, business and services uses - only set criteria.</b>	This approach allows complete flexibility, in the spirit of the change to the Use Class Order.	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.	Alternative Option
d	<b>Do not designate active frontages.</b>	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.	Alternative Option (considered detrimental)

### Ensuring community assets are available locally

- 7.7 The Use Class Order now includes the Use Class F2, which is designed to protect local community assets. These assets may be embedded within local communities and do not need to be directed to town centres. Local community assets include indoor and outdoor pools, outdoor sports, community halls and also small shops of under 280m<sup>2</sup> selling essential items and which are over 1km from another similar shop (e.g. corner shops). Facilities within this use class cannot be lost to a different

use class without planning permission, so it is possible to protect them through planning policies. These local community assets help foster a sense of community and belonging, enhancing health and wellbeing. They may function as a meeting place, a place for leisure and fitness, a place for community and interest groups to meet and so on. Generally, Oxford is well provided for, with many community facilities available locally to people.

- 7.8 In order to achieve strong communities, equality, and 15-minute city principles, it is important that existing local community assets are protected, although there may be exceptions if re-provision can occur, potentially in a way that is more efficient, for example through shared facilities. In addition to the protection of existing facilities, a positive view should be taken of proposals for new facilities, in the right locations. They should be in an accessible location to the community they are going to serve. Community use agreements for new private facilities will also improve access to social and community infrastructure, particularly where there are identified gaps in current public access across the city.

<b>Policy Option Set C3: Protection and alteration of existing local community assets (including swimming pools and outdoor sports)</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Protect local community assets with a policy that would resist their loss, unless it can be demonstrated that:</b> <ul style="list-style-type: none"> <li>• There is no longer a need, or there is overriding demand for an alternative community use on the site; or</li> <li>• Suitable replacement provision can be provided on-site, or within a suitable</li> </ul>	<p>This approach recognises the importance of local community assets 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.</p> <p>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 evidence to be provided to underline this case.</p> <p>Promoting 15 minute neighbourhood concepts is a key aspiration for the Local Plan, defining accessibility in these terms will help to ensure that any re-provision</p>	<p>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.</p>	Preferred Option (in combination with b)

	<p><b>alternative and accessible* location for its users.</b></p> <p><b>*Accessible location would be defined in terms of the impact on achieving 15 minute neighbourhoods in the first instance.</b></p>	<p>does not force people to use less sustainable modes of transport to continue to use the facility (e.g. car).</p>		
<b>b</b>	<p><b>Set out that permission will be granted for alteration and expansion of existing local community assets, although potentially preventing F2 shops from expanding so they become Use Class E and could be lost to housing or other commercial uses.</b></p>	<p>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.</p>	<p>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.</p>	<p>Preferred Option (in combination with a)</p>
<b>c</b>	<p><b>Do not have a policy protecting local community assets - rely on national policy, or future national development management policies</b></p>	<p>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.' 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.</p>	<p>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.</p>	<p>Alternative Option (considered detrimental)</p>

<b>Policy Option Set C4: Provision of new local community assets</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>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 (defined in terms of 15 minutes walking in the first instance).</b>	<p>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.</p> <p>Promoting 15-minute neighbourhood 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).</p>	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.	Preferred Option (in combination with b)
b	<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.</b>	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.	Preferred Option (in combination with a)
c	<b>Do not have a policy addressing provision of new local community</b>	The NPPF does provide support for the provision of 'accessible services' that reflect current and future needs and support communities. It highlights the	This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for	Alternative Option

	<b>assets; rely on national policy, or future national development management policies.</b>	importance of achieving healthy, inclusive and safe places.	ensuring that this requirement is planned for to meet the needs of both existing and future demand.	
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## Learning and non-residential institutions

7.9 The Use Class Order includes the use F1, which is learning and non-residential institutions and which includes schools, colleges, galleries, museums libraries and places of worship. These facilities are also important in enabling people to thrive, although there will often be a willingness to travel further than a 15-minute walk to access some of them. Local plan policies can help to protect these facilities. New facilities may also be proposed or required and this will generally be seen as very positive. However, these uses can attract many people and have potential to be significant generators of car traffic.

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by travel and important. Therefore, a policy approach will be needed that ensures these come forward in suitable locations that are accessible walking and cycling (and public transport), that parking standards are in place, alongside travel plans, to limit car that these uses do not cause a nuisance to neighbouring streets. Oxfordshire County Council is the lead authority for education and libraries, so close working with them to identify needs and manage and support facilities will be

<b>Policy Option Set C5: Protection and alteration of existing learning and non-residential institutions (including schools, libraries and places of worship)</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Protect existing learning and non-residential institutions with a policy that would resist their loss, unless it can be demonstrated that:</b> <ul style="list-style-type: none"> <li>• There is no longer a need or foreseeable</li> </ul>	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,	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.	Preferred Option (in combination with b)

	<p><b>need, or there is overriding demand for an alternative community use on the site; or</b></p> <ul style="list-style-type: none"> <li>• <b>Suitable replacement provision can be provided on-site, or within a suitable alternative and accessible* location for its users; or</b></li> <li>• <b>It can be demonstrated that the use can no longer feasibly be provided in its location</b></li> </ul> <p>*Accessible location would be defined in terms of 15 minutes walking in the first instance.</p>	<p>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.</p>		
<b>b</b>	<b>Set out that permission will be granted for alteration and expansion of existing learning and non-residential institutions.</b>	<p>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.</p>	<p>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.</p>	Preferred Option (in combination with a)

<b>c</b>	<b>Do not have a policy protecting learning and non-residential institutions-rely on national policy, or future national development management policies.</b>	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. 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.	Alternative Option (considered detrimental)
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#### Policy Option Set C6: 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	Related options, conclusion
<b>a</b>	<b>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, accessibility, size of site and neighbouring uses.</b>	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.	Preferred Option

<b>b</b>	<b>Do not include any criteria against which learning and non-residential institution proposals will be judged.</b>	These uses bring benefits for the community, and this approach would not prevent them being brought forward, in any location.	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.	Alternative Option (considered detrimental)
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## Cultural, social and visitor attractions

7.10 Oxford has a rich provision of cultural and social activities and venues such as theatres, cinemas, and music venues. These venues attract visitors from within the city and tourists. These are the cultural lifeblood of the city for many people and they should be celebrated and protected. The tourism economy does also make an important contribution to Oxford's economy overall, helping to support jobs and the wide range of attractions that can be enjoyable to all. However, too many visitors in the wrong locations can create conflicts, ultimately deterring future visits and affecting quality of life for local residents too, for example if there is too much traffic or unsociable noise and hours that affects residents. These uses are classed 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. Therefore, a policy can set out criteria for the consideration, such as around the location.

<b>Policy Option Set C7: Protecting cultural, social and visitor attractions</b>				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
<b>a</b>	<b>Include a criteria-based policy that protects existing venues and only allows their loss in exceptional circumstances if justified against a clear set of criteria that includes requirements for viability and marketing evidence, or replacement.</b>	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	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.	Preferred Option

		uses especially where they are found near one another.		
<b>b</b>	<b>Do not include a policy that protects existing venues</b>	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.	Alternative Option (considered detrimental)

#### Policy Option Set C8: 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	Related options, conclusion
<b>a</b>	<b>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.</b>	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.	Preferred Option
<b>b</b>	<b>Allow new cultural, social and visitor attractions in the city and district centres only.</b>	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	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.	Alternative Option

		gives further potential to enhance the vibrancy of the city and district centres.		
c	<b>Do not allow new cultural, social or visitor attractions</b>	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.	Alternative Option (considered detrimental)
d	<b>No Policy. Rely on other policies in the Local Plan and national policies where applicable.</b>	Provides flexibility for the provision of these uses.	Reliant on other policies to mitigate any potential negative impacts on transport, heritage, and wider environment.	Alternative Option (considered detrimental)

## Pubs

7.11 Pubs are a unique facility. They are often found in the heart of communities, where there may be no other meeting places or facilities. Their special place within communities and the range of benefits they offer, means that they need specific protection and a generally strongly supportive approach.

<b>Policy Option Set C9: Pubs</b>				
Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion	

	<b>a</b> <b>Include a policy to protect pubs, using a criteria-based approach. This would include evidence of diversification to establish a wider customer base and lack of viability (evidenced by marketing); lack of need for a pub and an assessment of the community value of the pub including design, character and heritage contribution to the character of the local area.</b>	This includes a balanced approach to the protection of pubs, considering whether the owners have sought to diversify, whether there is a viability argument, whether there is other provision nearby to serve the community and the importance of the pub to the local community. Pubs can be important to the local community for a wide range of reasons. This approach acknowledges that. Pubs are different to other community facilities and a bespoke policy acknowledges that.	This adds another policy layer. To demonstrate proper marketing has taken place will take some time and that could leave an empty building for some time.	Preferred Option
	<b>b</b> <b>Include a policy to protect pubs relying on marketing evidence only.</b>	This is a simpler approach which focuses on what is likely to be the key reason for pubs needing to close down.	This approach would still need marketing evidence so could still result in a closed down building for some time. It does not take account of the important aspects of pubs to a local area.	Alternative Option
	<b>c</b> <b>Do not include a policy to protect pubs but rely on a general protection of community facilities policy.</b>	This acknowledges that pubs are a community facility and protects them for that reason.	This approach does not acknowledge that there may be genuine viability reasons that means pubs need to close.	Alternative Option

Transport assessments, travel plans and servicing and delivery plans

7.12 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. Limiting the need to travel, and promoting a development pattern that allows people to make linked trips and travel by walking, cycling and public transport are vital to achieving this. Key tools used to appraise and determine the transport impacts of a development proposal are transport assessments (TA) and travel plans (TP). A transport assessment is a comprehensive and systematic process to ensure that the transport impacts of the development are properly considered and where appropriate includes measures to help mitigate development impact. A travel plan is a package of measures tailored to the needs of an individual site and focused on reducing dependence on the private car.

Commercial deliveries will always need to be made to Oxford and this should be done in the most sustainable way. Specific Delivery and Servicing Management Plans (DSPs) are required to be submitted for proposals that will affect the city centre or district centre and also for sites in close proximity to residential areas. They should set out measures that will be introduced to minimise impacts, such as managing delivery times and vehicles.

<b>Policy Option Set C10: Transport assessments, travel plans and servicing and delivery plans</b>				
	<b>Option for policy approach</b>	<b>Potential positive consequences of the approach</b>	<b>Potential negative/neutral consequences of the approach</b>	<b>Related options, conclusion</b>
a	<b>Require transport assessments 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.</b>	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 should include, for example, targets associated with the proportion of journeys made to and from the development site by travel modes more sustainable than the private car, and measures such as bus passes.	These requirements could be seen as an extra burden on developers and those assessing applications. TPs, 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 TP with appropriate sanctions for non-compliance.	Preferred Option (in combination with b)

<b>b</b>	<p><b>Require transport assessments to also include servicing and delivery plans, where relevant.</b></p>	<p>Including service and delivery plans as part of the assessment process will also help reduce the impacts of freight and service vehicles by requiring measures to minimise these issues, such as managing delivery times. This is particularly important in busy and confined areas such as the city centre and also for sites in close proximity to residential areas.</p>	<p>These requirements could be seen as an extra burden on developers and those assessing applications.</p>	<p>Preferred Option (in combination with a)</p>
<b>c</b>	<p><b>Do not include a policy requiring transport assessments, travel plans or servicing and delivery plans.</b></p>	<p>Not requiring these reduces the burden on developers and assessors.</p>	<p>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.</p>	<p>Alternative Option (considered detrimental)</p>

## 8.0 Development Sites, Areas of Focus and Infrastructure

### Introduction

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- 8.1 The 2040 Oxford Local Plan alongside the adopted Neighbourhood Plans provides the opportunity to set out the planning policy framework for the city. To guide the right level of development to the optimum location, whilst fully considering the city's constraints, the Plan contains site allocation policies. The background information as to how development sites were selected and assessed is set out in the background paper. The options for the site allocations are limited to A or B, allocate or don't allocate. However, if a landowner has suggested an alternative option through the landowner engagement process, that has been recorded as option C and the proposed land uses are included in the options table.
  - 8.2 The communities' chapter provides the policy options to support the concept of 15-minute neighbourhoods, whereby communities have access to all their daily needs within a 15-minute walk, which have become increasingly popular approaches to the way we think about the planning of our local areas. To have most of our shopping, community, primary education, health, socialising and recreational needs within a short walk or cycle would not only reduce the negative impacts of future pandemics, but also promote healthier and more active lifestyles as well as reduce our impacts upon the climate and the natural environment.

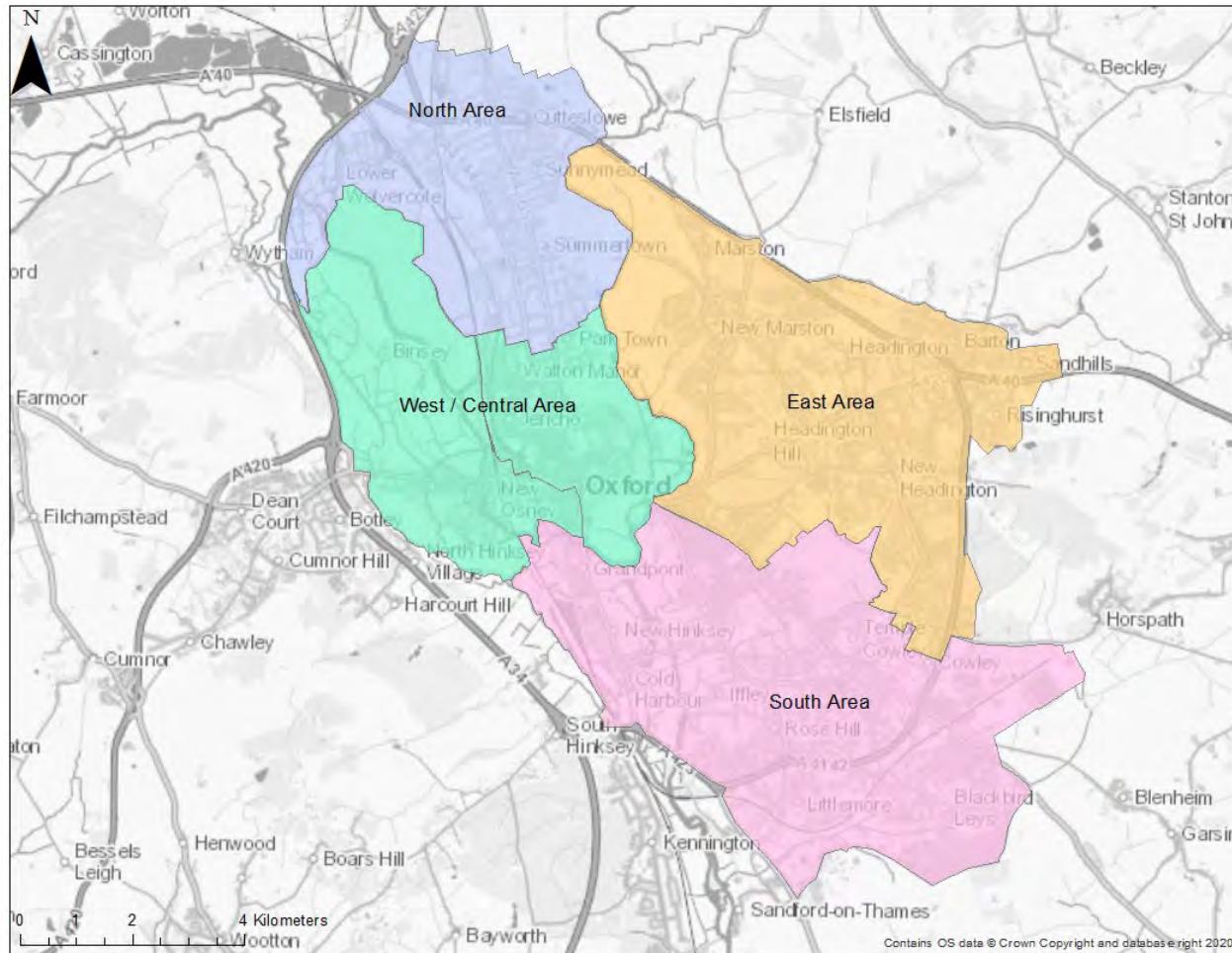
### Infrastructure needs to support new and existing developments up to 2040

- 8.3 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<sup>1</sup>. The Infrastructure Delivery Plan (IDP) has been produced to support development of the Oxford Local Plan 2036 and an addendum has been prepared as part of the evidence base to support this Regulation 18 Preferred Option Local Plan 2040. The IDP provides a summary of infrastructure constraints and needs across Oxford and sets out the infrastructure schemes to meet those needs considering the level of housing and employment growth being planned for. Engagement with infrastructure providers is an ongoing process and we recognise the importance of the need for

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<sup>1</sup> Infrastructure relates to schools, hospitals, utilities, digital communication, transport provision, community facilities etc.

this to ensure realistic accurate information is provided. The IDP has divided the city into four quadrants as shown in Figure D1, which we have then used to structure this chapter.



*Figure D1: The four areas of the city considered in the IDP*

- 8.4 The proposed development site options for the new Local Plan have been listed for each of the four quadrants set out in the figure above, though we recognise that Oxford's compact nature means that often infrastructure is serving the whole city and it does not always neatly fit into one quadrant or another. The Preferred Options consultation process will seek views as to infrastructure requirements for the city to 2040.

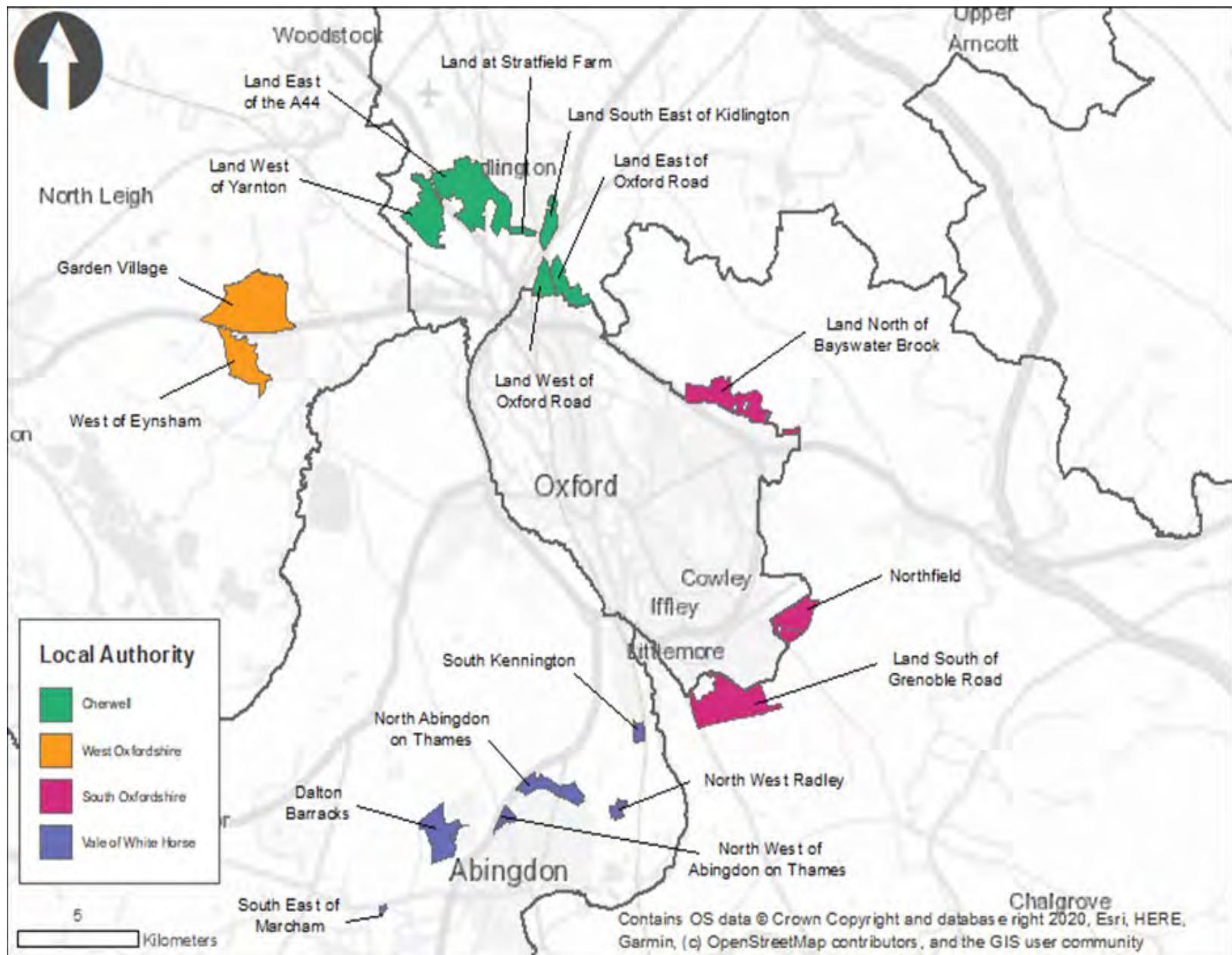
#### Unmet need sites beyond the city boundary

- 8.5 There are several sites on the edge of Oxford which have been allocated for housing in neighbouring district plans to accommodate the unmet need for Oxford. The work to identify the level of housing need to 2040 has yet to be completed but the evidence from the current plan alongside the information we have about housing waiting lists, information in our housing trajectory and the impact of the pandemic upon housing delivery in the city and across the country points to the fact that this situation will remain the case. The details of these sites are set out in Figure D2 and illustrated in Figure D3. Whilst each of the neighbouring authorities will be responsible for the delivery of these sites, the Council retains a strong interest in seeing them developed in a sustainable manner. In infrastructure terms, this means that they should be well connected into existing networks and reflect Oxford's particular approach to transport provision, with a strong emphasis on the need for dedicated pedestrian and cycle provision in addition to an effective public transport system offering residents a realistic alternative to the private car.

Local authority	Site	Total dwellings
Cherwell	Land East of Oxford Road	690
Cherwell	Land West of Oxford Road	670
Cherwell	Land Southeast of Kidlington	430
Cherwell	Land at Stratford Farm	120
Cherwell	Land East of the A44	1,950
Cherwell	Land West of Yarnton	540
South Oxfordshire	Land South of Grenoble Road	3,000

South Oxfordshire	Land at Northfield	1,800
South Oxfordshire	Land North of Bayswater Brook	1,100
Vale of White Horse	Oxford and Abingdon Fringe area of search	2,200
West Oxfordshire	West of Eynsham	550
West Oxfordshire	Salt Cross Garden Village	2,200
<b>Total dwellings on unmet need sites</b>		<b>15,250</b>

*Figure D2: Total dwelling capacity on unmet need sites beyond the city boundary*



*Figure D3: Location of unmet need housing sites within adjacent Oxfordshire local authorities*

## Site Allocations

- 8.6 A 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. The purpose of the site allocation is to allocate sites for built development or to maintain a type of built development on site. Site allocations are important because they give guidance and certainty to developers and landowners and residents as to how a site can be developed in terms of acceptable uses and areas to be protected. Thus, site allocations provide a positive policy to help ensure that the right type of development is delivered on a site which supports the Plan's strategy and is in conformity with the National Planning Policy Framework. A sequential approach should be taken towards the site layout of development proposals in site allocations in Flood Zones 2 and 3 in accordance with the NPPF (refer to policy option G7).

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## Areas of Focus

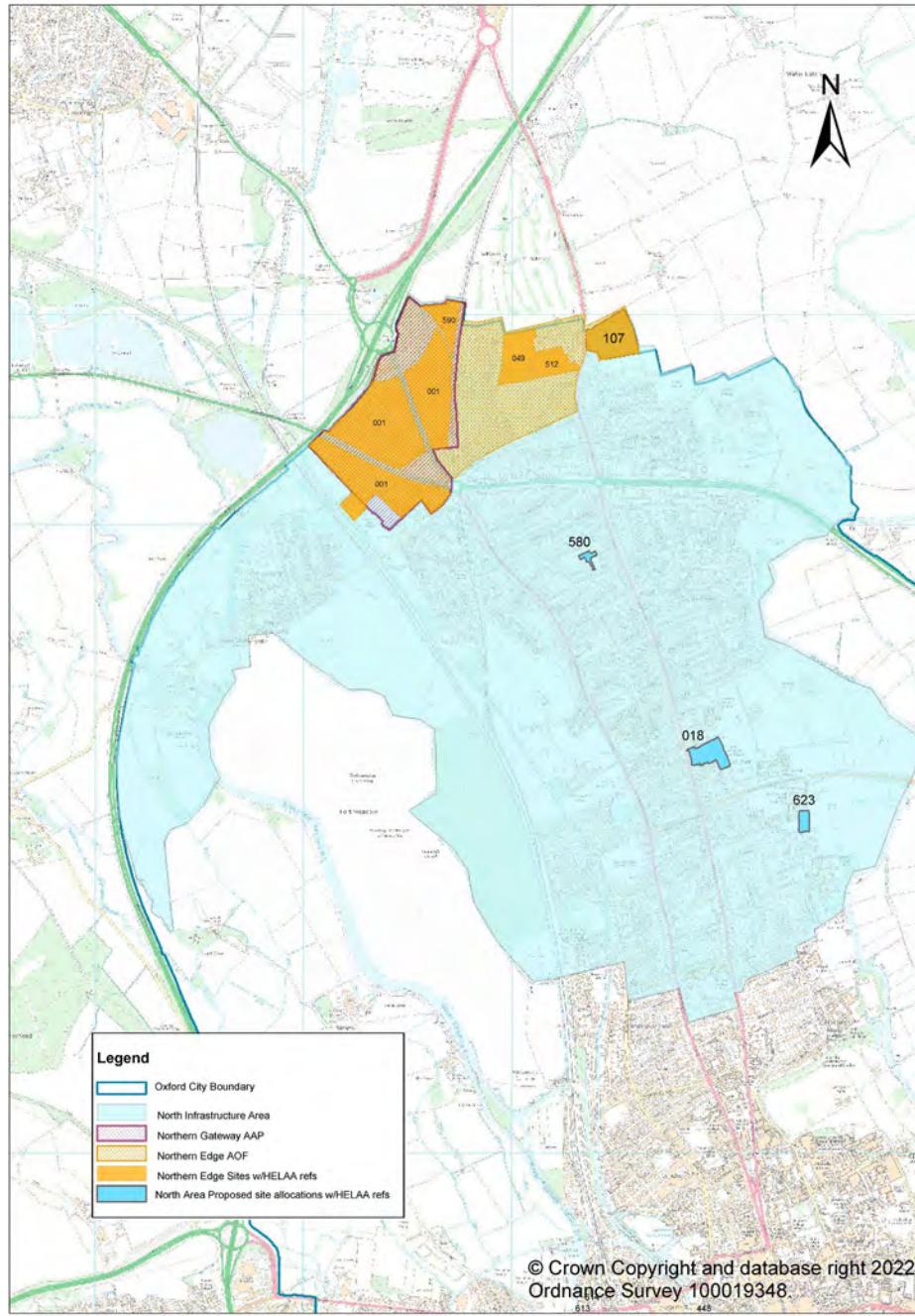
- 8.7 Traditional Local Plans have policies only at individual site level which means that cumulative impacts can be overlooked. As such, we propose identifying several 'Areas of Focus' across the city which we have defined as areas where changes are anticipated over the Plan period resulting from new development which could be both within the city or adjacent to the city's boundary. The benefit of identifying Areas of Focus is that as development sites come forward, they can be determined against some key policy principles relevant to that area and thus can be considered in the wider context of the area and the other potential developments. Where these cumulative impacts are overlooked, they can have a detrimental impact on place making, design and infrastructure provision, which we are seeking to minimise through this approach. As the city changes and evolves to 2040, development policies need to be guided by some key principles for development which include issues related to movement and connectivity, enhancing and creating high quality public realm and open space, future proofing design to be adaptable to climate change and be carbon neutral. It is anticipated that these Areas of Focus will become site allocation policies which will include some key development principles specific to that area.

- 8.8 We have grouped the areas of focus within each of the four IDP quadrants as follows:
- North Area quadrant of city - containing the Northern Edge of Oxford Area of Focus and North Area proposed development sites
  - South Area quadrant of city - containing the Cowley Branch Line, Littlemore and Leys Area of Focus and South Area proposed development sites
  - East Area quadrant of city – containing the Marston Road and Old Road Area of Focus and East Area proposed development sites
  - West and Central Area quadrant of city – containing the University Sites Area, West End and Botley Road Areas of Focus and West and Central Area proposed development sites.

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## North Area

Northern Edge of Oxford Area of Focus



*Figure D4: Northern Edge of Oxford Areas of Focus and proposed development sites*

- 8.9 The “Northern Edge of Oxford Area of Focus” lies within the North Area and includes the development sites which are adjacent to urban extension areas in Cherwell District Council (CDC). The development of these areas as for all the urban extensions surrounding the city must be well integrated with the city in terms of improved pedestrian, cycling and public transport connectivity. Opportunities should be sought to reduce and rationalise public and workplace car parking to optimise the most efficient use of land. Oxford North (formerly Northern Gateway) policy framework is set out in the existing Northern Gateway Area Action Plan and the outline planning permission for the area. The options below support continuing this approach rather than the 2040 Plan incorporating a specific site allocation policy.

Area of focus and specific development sites (with HELAA number)	Contextual analysis	Key principles for all sites across the area	Sites within the area of focus for minimum housing numbers, key principles	Options
<b>Northern Edge of Oxford including:</b>  <b>OUP Sports Ground.</b> HELAA #49  <b>Jordan Hill Business Park.</b> HELAA #512  <b>Frideswide Farm.</b>	<ul style="list-style-type: none"> <li>• Generally low-density suburban development and includes former independent rural settlements such as Wolvercote and Godstow</li> <li>• Some parts of the area are in the least deprived parts</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure connectivity by foot and cycle to sites adjoining the city</li> <li>• Connectivity of local facilities and services (that may be in Cherwell) and communities</li> <li>• Key characteristics to enhance, based on contextual analysis</li> <li>• Increase public access to green spaces</li> <li>• Potential to intensify Jordan Hill Business Park, with any</li> </ul>	<ul style="list-style-type: none"> <li>• OUP Sports Ground (to have minimum number of housing units and significant amount of public open space and reprofiling of sports pitch capacity)</li> <li>• Frideswide Farm (likely to have commenced, resolution to grant planning permission subject to S106.)</li> <li>• Oxford North</li> </ul>	<p><u>Preferred Options:</u></p> <p><u>A.</u> Designate area of focus with its own site allocation policy listing what would be required to be delivered in the specific area eg. Issues of density, improved pedestrian and cycle connectivity</p> <p><u>B.</u> Include detailed site development policies for sites listed</p> <p><u>Alternative Option:</u></p> <p><u>C.</u> Include a different combination of sites within the area of focus or for different mixes of land use</p> <p><u>Alternative Options (considered detrimental):</u></p>

<p><b>HELAA #107</b></p> <p><b>Oxford North (formerly Northern Gateway).</b></p> <p><b>HELAA #1</b></p> <p><b>Pear Tree Farm.</b></p> <p><b>HELAA #590</b></p>	<p>of the city, as such, housing affordability is a significant challenge.</p> <ul style="list-style-type: none"> <li>• Severance by some key routes and junctions</li> <li>• Poor air quality</li> <li>• Lack of connections with adjoining area outside city (in Cherwell District)</li> <li>• Cutteslowe park is an excellent community facility and open space</li> <li>• Five Mile Drive Sports Ground</li> <li>• Limited open space in west of the area- OUP private sports grounds</li> </ul>	<p>expansion to be limited and part of a mixed-use scheme</p> <ul style="list-style-type: none"> <li>• Improvements to pedestrian and cycle routes, including safe crossing at desire lines across the major roads in the area</li> <li>• Protect the SSSI at Port Meadow</li> <li>• Green Belt edges</li> <li>• Wolvercote Neighbourhood Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Pear Tree Park and Ride area</li> <li>• Pear Tree Farm to have a minimum number of housing units, public open space and compensatory improvements should be made to the surrounding areas of Green Belt in accordance with the <i>Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report</i>.</li> </ul>	<p><u>D.</u> Do not designate the area of focus</p> <p><u>E.</u> Do not allocate sites within the area of focus</p>
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	<ul style="list-style-type: none"> <li>• Jordan Hill Business Park is low density</li> <li>• Poor connectivity across ring road for cycling and walking</li> </ul>			
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### North Area proposed development sites outside of the Areas of Focus

Site name and address and HELAA number	Existing use and type of location	Consideration for allocation including constraints and landowner intention	Options for consideration
<b>Summertown House, Apsley Road.</b> HELAA #580	Graduate student accommodation, nursery. Suburban location	Landowner interested in expansion of student accommodation. Already in that use so acceptable. Benefits of more efficient use of land. Apsley Road quiet residential street of 2-storey homes. Listed building in centre of site (mansion house).	A. Allocate for graduate student accommodation B. Do not allocate
<b>Diamond Place, Summertown.</b> HELAA #18	Car park, offices and academic use sites is within the Summertown District Centre	Landowner is interested in bringing forward a mix use development with some residential and student accommodation	A. Allocate for a mixed-use development B. Do not allocate
<b>Wychwood Tennis Courts, Charlbury Road.</b> HELAA #623	In use for open air sports in suburban area.	Landowner interest in developing for residential use.	A. Allocated for residential B. Do not allocate

South Area

Cowley Branch Line, Littlemore and the Leys Area of Focus

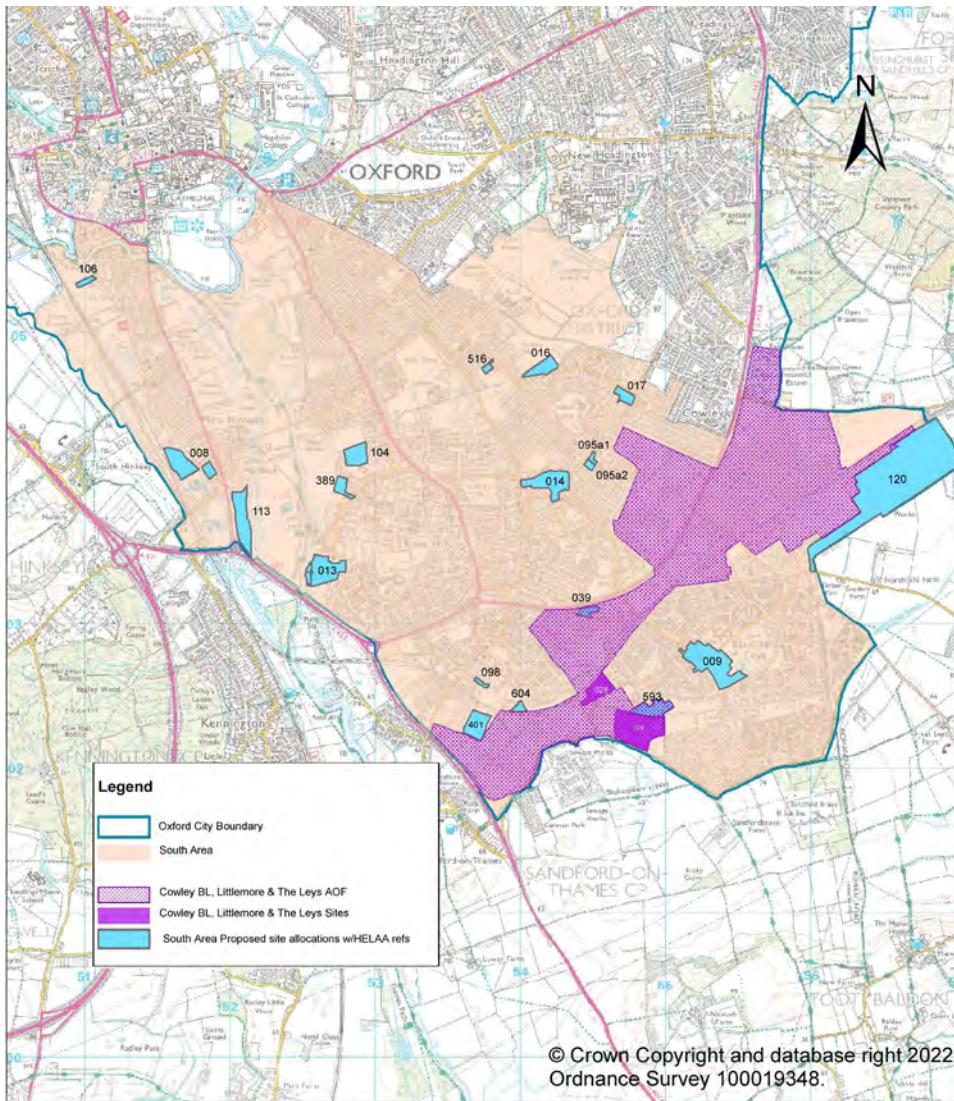


Figure D5: Cowley Branch Line, Littlemore and Leys Areas of Focus and proposed development sites

8.10 This Area of Focus 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 the large employers of BMW Group, Oxford Science and Oxford Business Park. Key objectives for this area are around improving and enhancing connectivity to this part of the city other than by private car. The opening up of passenger services along the Cowley Branch Line will 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, including where its passengers may come from, extends beyond this area. Two stations are proposed along the line at Oxford Science Park and in the vicinity of Oxford Business Park/Oxford Retail Park. This area will experience considerable change 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).

Area of focus and specific development sites (with HELAA number)	Contextual analysis	Key principles across the area	Sites within the area of focus for minimum housing numbers, key principles	Options
<b>Cowley Branch Line, Littlemore and the Leys Area of Focus including:</b>  <b>Kassam Stadium and Ozone HELAA #28a</b>	<ul style="list-style-type: none"> <li>• Major employment hubs</li> <li>• Area of high deprivation</li> <li>• Severance by some key routes and junctions</li> <li>• Poor air quality</li> <li>• Poor connectivity of this area to the rest of the city</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure good connectivity by foot and cycle and public transport across the area consider the connectivity of the urban extension area to the rest of the city and some sites in the city to the rest of the city.</li> <li>• Seek a reduction in car parking across the area.</li> </ul>	<ul style="list-style-type: none"> <li>• Kassam Stadium and surrounding area including Knight's Road. This existing allocation to be split into two sites, to cover the stadium site and the overflow car park site. The minimum number of housing units will vary depending on whether the Kassam Stadium remains as a stadium. Kassam Stadium allocation for residential</li> </ul>	<u>Preferred Options:</u> <u>A.</u> designate area of focus, the designation would cover density issues, protection of wildlife corridors, safeguarding land for Cowley Branch Line proposed stations and access, improved connectivity for the area and between areas.  <u>B.</u> include detailed site development guidance for sites listed  <u>Alternative Option:</u>

<p><b>Stadium overflow carpark #28b</b></p> <p><b>Oxford Science Park.</b> <b>HELAA #588</b></p> <p><b>Oxford Business Park.</b> <b>HELAA #587</b></p> <p><b>Mini Plant Oxford.</b> <b>HELAA #497</b></p> <p><b>Sandy Lane Recreation Ground.</b> <b>HELAA #289</b></p> <p><b>Oxford Stadium.</b> <b>HELAA #111</b></p>	<ul style="list-style-type: none"> <li>• Residential development is generally lower-density suburban typology</li> <li>• Poor cycling connectivity between Littlemore and Blackbird Leys</li> <li>• Very poor connectivity for cycling along Barns Road to Templar shopping centre</li> <li>• Poor connectivity across ring road for cycling and walking</li> <li>• Opportunities from community facilities like the Leys Pools, Kassam Stadium</li> <li>• Regeneration opportunities</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure land is safeguarded for stations and access for the proposed CBL.</li> <li>• Key characteristics to enhance the existing built environment, based on contextual analysis</li> <li>• Increase public access to green spaces</li> <li>• Ensure good urban design and place making opportunities are taken for the new residential areas to be brought forward.</li> <li>• Improvements to pedestrian and cycle routes, including safe crossing at desire lines across the major roads in the area linking housing and employment areas</li> <li>• Increase opportunities to enhance existing tree cover which is the lowest canopy cover across the city.</li> <li>• Improve walking and cycling connectivity to proposed Cowley Branch Line stations</li> </ul>	<p>scheme with minimum number of houses</p> <ul style="list-style-type: none"> <li>• Kassam surface level parking area residential allocation with minimum number of houses</li> <li>• Oxford Science Park has scope for intensification</li> <li>• Oxford Business Park protection of this key employment site</li> <li>• Sandy Lane Recreation Ground – residential scheme, minimum number of houses, reprocision of loss of sport's facilities.</li> <li>• Mini plant/BMW protection of key employment site</li> <li>• Oxford Stadium – mixed use development leisure and recreation and residential enabling development.</li> </ul>	<p><b>C.</b> Include a different combination of sites within the area of focus or for different mixes/ land uses</p> <p><b>Alternative Options (considered detrimental):</b></p> <p><b>D.</b> Do not designate the area of focus</p> <p><b>E.</b> Do not allocate sites within the area of focus</p>
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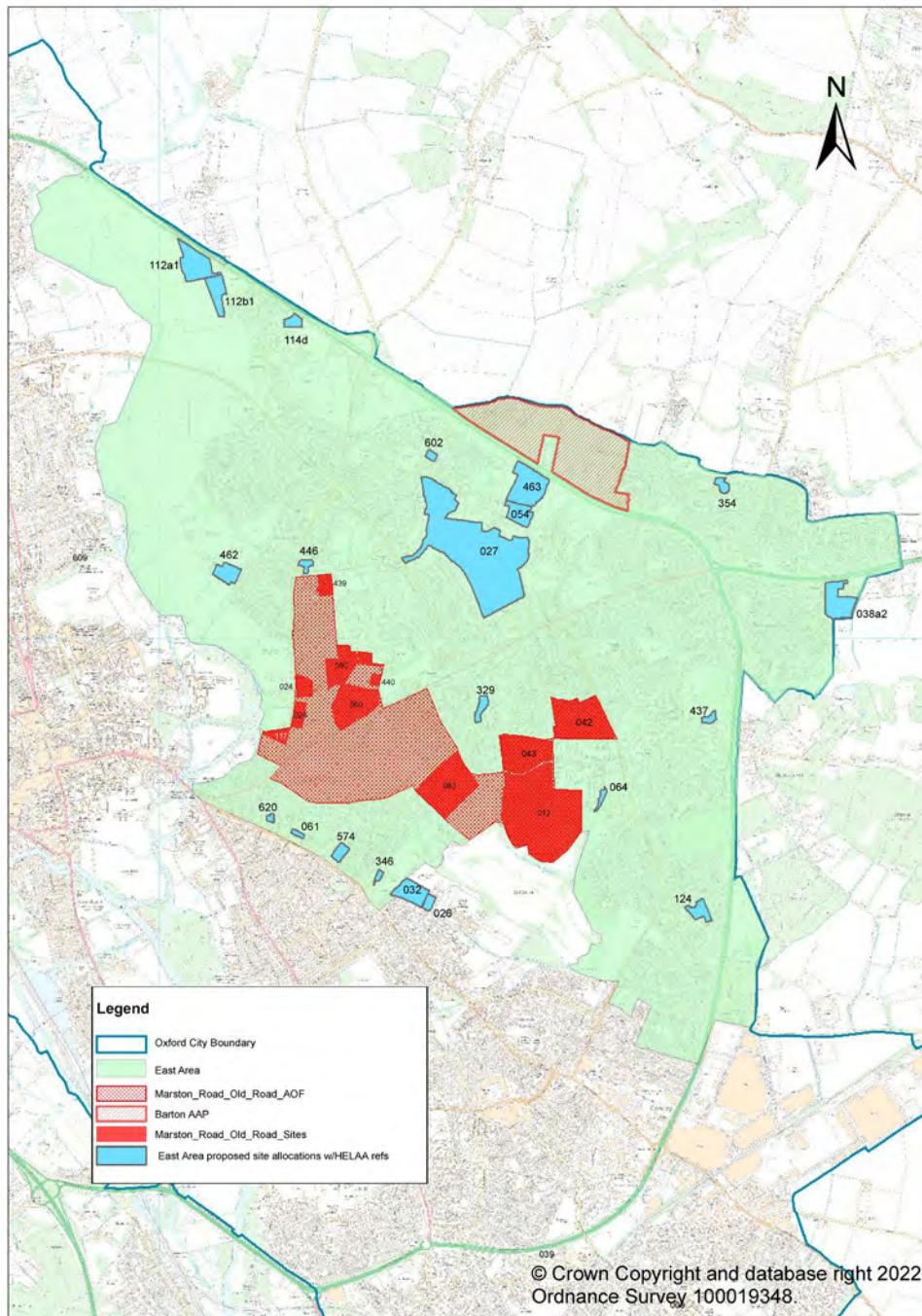
## South Area proposed development sites outside of Area of Focus

Site name and address and HELAA number	Existing use and type of location	Consideration for allocation including constraints and landowner intention	Options for consideration
<b>Bertie Place Recreation Ground.</b> HELAA #8	Suburban location Two parts of the site: Part A is a public recreation ground and Plot B is former landfill site.	Landowner interest in residential development. Plot A is suitable for development	A. Allocate for residential development or a primary school if required subject to provision of school playing fields in Wytham St B. Do not allocate
<b>Redbridge Paddock.</b> HELAA #113	Gateway site Meadowland used for grazing	Landowner interest in residential development and moorings, proximity to Iffley Meadow SSSI	A. Allocate for residential use B. Do not allocate
<b>Court Place Gardens.</b> HELAA #3	Suburban site Post graduate student accommodation	Landowner interest in redeveloping this site for graduate student accommodation – an application has been determined on this site and issued January 2022 with anticipated completion in 2023/24.	A. Allocate for residential use for graduate student accommodation or residential development or a mix of both B. Do not allocate if the development has commenced
<b>Land at Meadow Lane.</b> HELAA #389	Site lies within the Iffley Village Conservation area currently a paddock	Landowner interested in developing the site for residential development, area of Memorial Field would not be developed.	A. Allocate for residential use B. Do not allocate

<b>Northfield Hostel. HELAA #39</b>	Suburban site former hostel site for pupils at Northfield school	Planning permission granted for redevelopment of the site for residential development anticipated completion end of 2024.	A. Allocate for residential B. Do not allocate if the development has commenced
<b>Former Iffley Mead Playing Fields. HELAA #104</b>	Former playing fields which were once part of St Augustine's School now fenced off and has become overgrown grassy scrubland	Landowner interest in this site is to bring it forward for residential development.	A. Allocate for residential B. Do not allocate
<b>Unipart. HELAA #120</b>	Important employment site on the edge of the city adjacent to Northfield Strategic Site	Landowner interest is for continuation of this site to be used for employment.	A. Allocate for employment B. Do not allocate
<b>Blackbird Leys Central Area. HELAA #9</b>	This area comprises a mix of uses including the district centre and residential area, a range of leisure uses.	Landowner interest in the redevelopment of this area for mixed uses	A. Allocate for mixed use development B. Do not allocate
<b>Knight's Road. HELAA #593</b>	Open space with this suburban area	Landowner interest in a residential led scheme with public open space	A. Allocate for residential B. Do not allocate
<b>Cowley Marsh Depot. HELAA #16</b>	Council depot in suburban area	Landowner seeking an alternative site for the depot and if achieved this site could be released for housing.	A. Allocate for residential use B. Do not allocate
<b>Between Towns Road on corner of St Luke's Road. HELAA #95a2</b>	Former conservative club on the edge of the district centre	Some of this area has already been built out for student accommodation and only remaining area would need an allocation	A. Allocate for residential use B. Do not allocate
<b>Royal British Legion, Lakefield Road. HELAA #604</b>	British Legion Club in suburban area	Landowner seeking residential scheme on the site	A. Allocate for residential use B. Do not allocate

<b>Crescent Hall. HELAA #17</b>	Currently in use as student accommodation in suburban area.	Landowner expressed interest in further development for student accommodation.	A. Allocate for residential use for student accommodation. B. Do not allocate
<b>Workshops, Lanham Way. HELAA #98</b>	Former brownfield site in suburban area.	Landowner seeking residential scheme on the site.	A. Allocate for residential use B. Do not allocate
<b>Grandpont Car Park. HELAA #106</b>	Currently in use as a car park	Landowner seeking residential scheme on the site	A. Allocate for residential use B. Do not allocate
<b>Littlemore House (formerly Littlemore Park, SAE Institute). HELAA #401</b>	Currently in economic use.	Landowner expressed interest in intensification of site for further economic use.	A. Allocate for economic use. B. Do not allocate
<b>Former Powells Timber Yard, 574 Cowley Road. HELAA #516</b>	Former brownfield site in suburban area.	Landowner seeking residential scheme on the site (care home)	A. Allocate for residential B. Allocate for care home C. Do not allocate.
<b>Cowley Centre Templars Square. HELAA #14</b>	District Centre Shopping centre and town centre uses	Landowner interest in redevelopment of the site for mix of commercial, leisure and residential uses	A. Allocated for district centre/mix uses, commercial, leisure and residential B. Do not allocate

## Marston Road and Old Road Areas of Focus



*Figure D6: Marston Road and Old Road Areas of Focus and proposed East Area development sites*

8.11 This Area of Focus extends from the southwest part of Marston Road, incorporating Oxford Brookes and the Old Road Campus and the hospital sites. The area around this part of the Marston Road includes some underutilised sites with development potential. It is also a sensitive area because of proximity to important parks, proximity to the River Cherwell and several listed buildings. There are also some significant archaeological sites within this area including Civil War defences and the Fairfax siege line. The area includes Headington Hill Park and South Park. The area has an attractive and important natural setting and there are important views both into and out of the historic core of Oxford that must be protected.

Area of focus and specific development sites (with HELAA number)	Contextual analysis	Key principles across the area	Sites within the area of focus for minimum housing numbers, key principles	Options
<b>Marston Road, and Old Road Area of Focus including:</b> <b>Government Buildings and Harcourt House.</b> <b>HELAA #24</b>  <b>Land surrounding St Clement's Church.</b>	<ul style="list-style-type: none"> <li>• More open area with several parks and areas of public open space inc. some key views, particularly towards the historic core and across the Cherwell Meadow.</li> <li>• Range of uses inc. educational, residential, research and hospital.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure good connectivity by foot and cycle and public transport across the area and between hospital sites to provide/support a network of realistic alternatives for people other than using private car.</li> <li>• Seek to manage/reduce the levels of car parking on the hospital sites.</li> <li>• Maintain the frontage of St Clements Church and ensure setting is not compromised.</li> </ul>	<ul style="list-style-type: none"> <li>• Government Buildings and Harcourt House residential development with a minimum number of units, student accommodation and academic uses.</li> <li>• Land surrounding St Clement's Church – residential or student accommodation a minimum number required.</li> <li>• Headington Hill Hall and Clive Booth Student Village residential and student</li> </ul>	<u>Preferred Options:</u> <u>A.</u> designate area of focus, the designation would cover supporting development proposals for medical and clinical research and practice, ensuring views in and out of the area are protected, rationalising surface level car parking, ensuring protection of the Lye Valley SSSI

<b>HELAA #117</b>  <b>Headington Hill Hall and Clive Booth Student Village.</b> <b>HELAA #560</b>	<ul style="list-style-type: none"> <li>Poor air quality as a result of traffic congestion.</li> <li>Proximity to sensitive areas: River Cherwell, Marston SSSI, Lye Valley SSSI, heritage assets including Headington Hill Hall and St Clement's Church.</li> <li>Poor cycling connectivity from Headington area.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure protection of New Marston SSSI and Lye Valley SSSI.</li> <li>Seek opportunities to increase active frontages along the southern end of the Marston Road.</li> <li>Maintain the rural character of Cuckoo Lane whilst taking opportunities to enhance its function as a walking and cycling route.</li> <li>Ensure good urban design and place making. opportunities are taken for the redevelopment of Clive Booth Hall and Headington Hill Hall.</li> <li>Ensure heights of new development do not impact on views into the city's historic core or on amenity of residents.</li> <li>Ensure impacts upon the Conservation Areas are fully considered.</li> </ul>	<p>accommodation, academic and leisure uses – minimum housing numbers required.</p> <ul style="list-style-type: none"> <li>Oxford Brookes University Marston Road Campus, minimum housing numbers required.</li> <li>Old Road Campus – medical teaching and research facilities which maybe academic research and/or commercial research.</li> <li>Warneford and Churchill and Nuffield Orthopaedic Centre medical and healthcare facilities with some residential development such as employer linked housing or extra care accommodation.</li> <li>Pullens Lane residential development – minimum number.</li> </ul>	<u>B.</u> Include detailed site development guidance for sites listed  <u>Alternative Option:</u> <u>C.</u> Include a different combination of sites within the area of focus or for different mixes  <u>Alternative Options (considered detrimental):</u> <u>D.</u> Do not designate the area of focus  <u>E.</u> Do not allocate sites within the area of focus
<b>Old Road Campus.</b> <b>HELAA #43</b>				
<b>Warneford Hospital.</b> <b>HELAA #63</b>				
<b>Churchill Hospital.</b> <b>HELAA #12</b>				
<b>Nuffield Orthopaedic Centre.</b> <b>HELAA #42</b>				
<b>Pullens Lane Residential.</b> <b>HELAA #440</b>				

- 8.12 The strategic site of Land North of Bayswater Brook (STRAT 13) has been allocated in the South Oxfordshire Plan 2035. This site is expected to deliver affordable housing to meet Oxford's unmet need. Policy STRAT 13 recognises the need for this development to be well linked to the city in terms of both design and connectivity across the ring road.

### East Area proposed development sites outside of Area of Focus

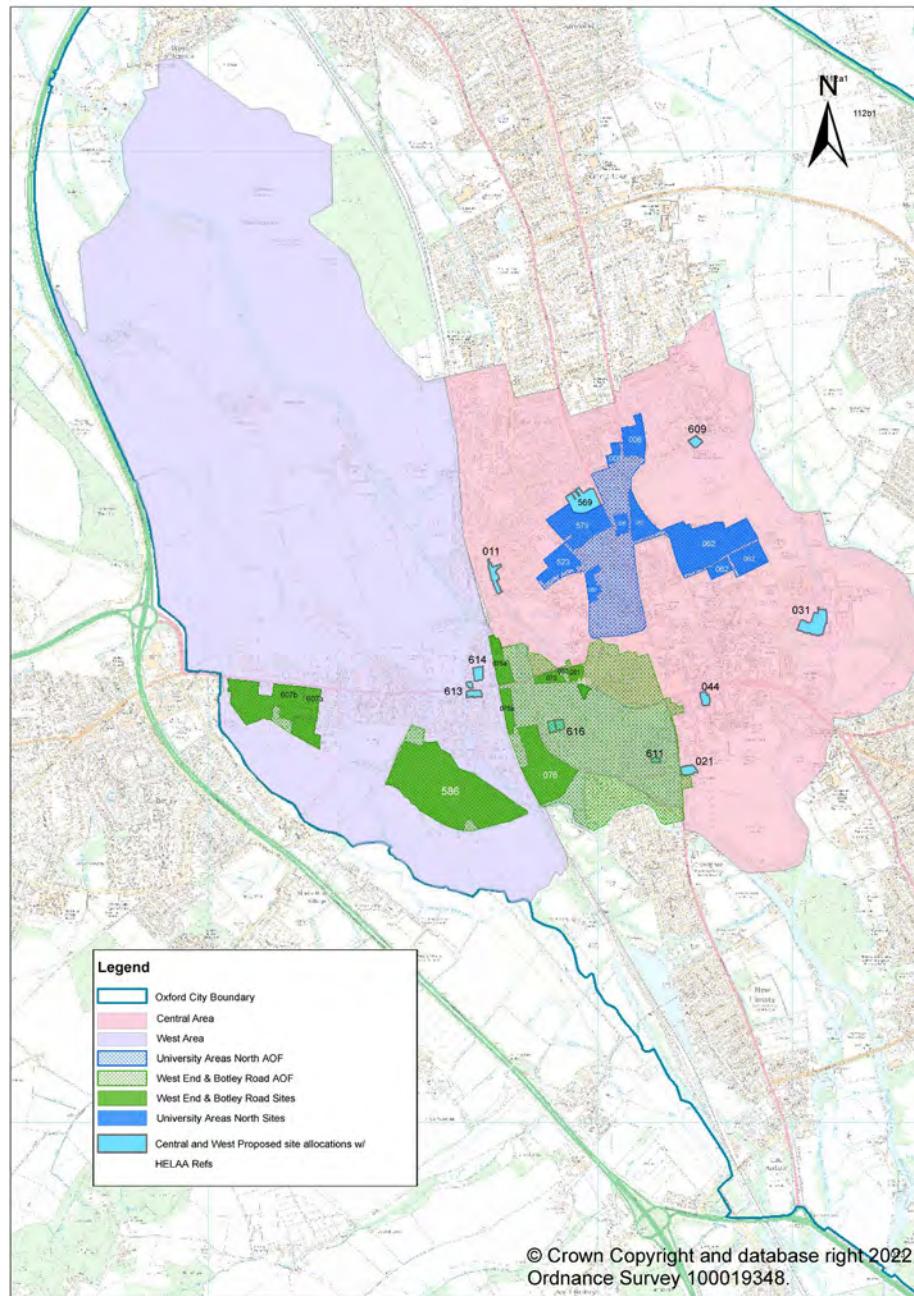
Site name and address	Existing use and type of location	Consideration for allocation including constraints and landowner intention	Options
<b>Hill View Farm. HELAA #112a1</b>	Former Green Belt land released from GB in OLP 2036. Planning permission granted for residential development. Suburban location	Landowner seeking to deliver a residential scheme anticipated build out 24/25.	A. Allocate for residential development B. Do not allocate if development has commenced.
<b>Land West of Mill Lane. HELAA #112b1</b>	Former GB land released in OLP 2036 for residential development. Suburban location	Landowner seeking to deliver a residential scheme, resolution to grant planning permission subject to issuing of Section 106 agreement	A. Allocate for residential development B. Do not allocate if development has commenced
<b>Marston Paddock. HELAA #114d</b>	Former GB land released in OLP 2036 for residential development.	Landowner interested in residential development	A. Allocate for residential development B. Do not allocate
<b>Barton Community Centre and Underhill Circus Shops HELAA #354</b>	Community centre and local shops not a local centre but being proposed in the policy options in suburban area of Barton	Proposed to include as a local centre	A. Allocated for mix of uses as part of local centre B. Do not allocate

<b>John Radcliffe Hospital site.</b> <b>HELAA #27</b>	Hospital and complementary health care, some residential development in suburban area	Hospital, health care and complementary uses including key worker housing /employer linked housing, small scale retail units ancillary to the hospital	A. Allocate for health care and complementary uses B. Do not allocate
<b>Ruskin Field.</b> <b>HELAA #463</b>	Green open space, college field	Residential development	A. Allocate for residential development B. Do not allocate
<b>Ruskin College Campus.</b> <b>HELAA #54</b>	Educational campus with student accommodation	Landowner seeking to ensure the most efficient use of land	A. Allocate for educational and student accommodation B. Do not allocate
<b>Thornhill Park.</b> <b>HELAA #38a2</b>	Residential development former employment site former Nielsen building has already been converted to residential accommodation.	Landowner seeking to deliver a residential scheme	A. Allocate for residential development B. Do not allocate
<b>Oxford Trust Wood Centre for Innovation.</b> <b>HELAA #437</b>	Employment use set in woodland in this suburban part of the city	Employment uses	A. Allocate for employment uses if there is opportunity for expansion/intensification on the site B. Do not allocate
<b>Slade House.</b> <b>HELAA #124</b>	Health care and ancillary office accommodation	Landowner seeking to use the site for health care facilities and/or residential development	A. Allocate for health and/or residential development B. Do not allocate
<b>Manzil Resource Centre.</b> <b>HELAA #574</b>	Health care, complementary uses and employer linked housing	Landowner seeking to use the site for existing uses and/or residential development in form of employer linked housing	A. Allocate for health and/or residential development which could be employer linked housing. B. Do not allocate
<b>Union Street Carpark.</b> <b>HELAA #61</b>	Car park in district centre	Landowner interested in residential or student accommodation with some car parking	A. Allocate for residential/student development B. Do not allocate

<b>Park Farm. HELAA #462</b>	Land is grassland and a small area of hardstanding	Landowner interested in residential development on the site	A. Allocate for residential development B. Do not allocate
<b>Carpenter's Yard. HELAA #446</b>	Former employment uses in this Suburban area	Landowner seeking a care home, residential and student accommodation	A. Allocate for residential development B. Do not allocate C. Allocate for care home and or student accommodation
<b>Valentia Road. HELAA #329</b>	Informal recreational and play area suburban area	Landowner interested in residential development with improvements to the play area	A. Allocate for residential development B. Do not allocate
<b>Jesus College Sports Ground. HELAA #26</b>	Private open-air sports facility	Landowner seeking residential development and public open space. Sports facility must be retained or delivered elsewhere in the city	A. Allocate for residential development B. Do not allocate
<b>Lincoln College Sports Ground. HELAA #32</b>	Private open-air sports facility	Landowner seeking residential or student accommodation and sports facility must be retained or delivered elsewhere in the city	A. Allocate for residential development B. Do not allocate
<b>Former Bartlemas Nursery School. HELAA #346</b>	Redundant land used to be site of nursery school	Landowner has sought permission for student accommodation	A. Allocate for residential development B. Do not allocate
<b>Halliday Hill/Westlands Drive. HELAA #602</b>	Regeneration area within Northway	Landowner seeking residential development and application has been submitted.	A. Allocate for residential development B. Do not allocate
<b>Rectory Road Centre. HELAA #620</b>	Site currently in use for healthcare. Located within District Centre	Landowner interested in residential development subject to consolidation	A. Allocate for residential development B. Do not allocate

		of healthcare services onto other site/s.	
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## Central and West Oxford Area



*Figure D7: Central and West Areas of Focus and proposed development sites*

### University areas north of the city centre Area of Focus

8.13 The area to the north of the city centre is dominated by several University of Oxford buildings of a wide range of styles, ages and sizes. As these sites are controlled by one landowner there is more scope to ensure that new development and redeveloped buildings relate well to one another to create a better urban form and public realm. Opportunities should be taken to improve the permeability of this area and the use of some of the institutional buildings at ground level where achievable to bring a wider range of people into the area.

Area of focus and specific development sites (with HELAA number)	Contextual analysis	Key principles across the area	Sites within the area of focus for minimum housing numbers, key principles	Options
<b>University areas north of the city centre including:</b>  <b>Science Area and Keble Road Triangle.</b> HELAA #62  <b>ROQ.</b> HELAA #579	<ul style="list-style-type: none"> <li>• Dominated by institutional buildings of a wide range of styles, and ages including some RIBA award winning designs.</li> <li>• Many buildings with a large floorplate.</li> <li>• Some substantial Victorian dwellings mainly converted to academic use.</li> <li>• Interface with University Parks.</li> <li>• Lack of definition between public and private space.</li> <li>• Some routes are public but not obviously so, exacerbated by servicing features of the science</li> </ul>	<ul style="list-style-type: none"> <li>• Public uses of some institutional uses, especially at ground floor would be beneficial, for example cafes, exhibition spaces.</li> <li>• Better integrating servicing needs into the built form or enhanced landscaping of them is important.</li> <li>• Impacts of heights on views, including from University Parks an important consideration-</li> </ul>	<ul style="list-style-type: none"> <li>• Science Area and Keble Road Triangle – residential development and academic institutional area and associated research with minimum number of homes to be delivered. No adverse impacts upon the Marston SSSI.</li> <li>• Radcliffe Observatory Quarter – academic institutional uses, student accommodation and residential development.</li> </ul>	<u>Preferred Options:</u> <u>A:</u> designate area of focus with focus upon improved pedestrian and cycle links between sites and across the city; promotion of good place making and design principles and understanding of how each development can relate and complement the other.  <u>B:</u> Include detailed site development guidance for sites listed

<p><b>Banbury Road University Sites.</b> <b>HELAA #6</b></p> <p><b>West Wellington Square.</b> <b>HELAA #65</b></p> <p><b>Oxford University Press – Cat 1 Employment sites.</b> <b>HELAA #523</b></p>	<ul style="list-style-type: none"> <li>buildings such as delivery areas, chemical storage tanks, vents and extractors.</li> <li>There is little public use of the institutional buildings.</li> <li>Small pockets of parking that affect the public realm.</li> <li>Mature trees line key streets.</li> <li>Includes and is in the setting of significant heritage assets (e.g. Central Conservation Area, Radcliffe Observatory, North Oxford Victorian Suburbs, Jericho and Walton Manor Conservation Areas and University Parks).</li> <li>Many buildings individually of very high quality, although they don't always relate well to each other or their surroundings.</li> <li>Jericho local centre on the edge of the area which provides a range of facilities retail, leisure and health facility (Jericho health centre).</li> </ul>	<ul style="list-style-type: none"> <li>and roofscape, including the impacts of plant.</li> <li>Improved demarcation of public routes through these areas, through design and wayfinding.</li> <li>Tree planting and wayfinding away from the few key routes.</li> <li>Creating a stronger building line along the streets.</li> </ul>	<ul style="list-style-type: none"> <li>Development should not result in adverse impacts on the Oxford Meadows SAC.</li> <li>Banbury Road University Sites – academic institutional uses, student accommodation and/or residential development, enhance pedestrian and cycle links across the sites.</li> <li>West Wellington Square – academic institutional uses, student accommodation, seek opportunities to deliver more residential units, a minimum number of homes to be delivered.</li> <li>Oxford University Press – Cat 1 Employment site.</li> </ul>	<p><u>Alternative Option:</u> <u>C.</u> Include a different combination of sites within the area of focus or for different mixes</p> <p><u>Alternative Options (considered detrimental):</u> <u>D.</u> Do not designate the area of focus</p> <p><u>E.</u> Do not allocate sites within the area of focus</p>
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## West End and Botley Road Area of Focus

8.14 This area of focus includes several key West End sites, extends across the river to include Osney Mead and extends along the Botley Road to the retail park area. Most of this area will be covered by the West End and Osney Mead Supplementary Planning Document (SPD) which, once adopted, will provide more detailed guidance in addition to that already in the current Oxford Local Plan policies 2036. This area offers some significant development and regeneration opportunities but for them to be fully realised there are some key infrastructure priorities. The SPD seeks to ensure that development in the area is brought forward in a coordinated way that contributes to the wider vision for the area. The Area of Focus has been extended to incorporate the Botley Road

retail park as there are several changes happening on that site in a piecemeal way. To seek to address this prior to the adoption of the 2040 Plan the council have prepared a [design brief](#) for the area to guide future redevelopment of the site.

Area of focus and specific development sites (with HELAA number)	Contextual analysis	Key principles across the area	Sites within the area of focus for minimum housing numbers, key principles	Options
<b>West End and Botley Road.</b> <b>Oxpens.</b> <b>HELAA #76.</b>  <b>Osney Mead.</b> <b>HELAA #586</b>  <b>Oxford Railway Station.</b> <b>HELAA #75</b>  <b>Island Site.</b> <b>HELAA #70</b>  <b>Worcester Street Car Park.</b> <b>HELAA #81</b>	<ul style="list-style-type: none"> <li>Area contains a wide variety of buildings and uses including brownfield land, commercial premises.</li> <li>Key area of public transport provision, both rail and bus and Seacourt Park &amp; Ride along the Botley Road.</li> <li>Some parts fall into areas of high flood risk and so unsuitable for residential development.</li> <li>Poor air quality.</li> <li>Traffic congestion.</li> <li>Poor and congested access for cycling to the city centre and train station particularly between Osney Island and to the east of the train station. The retail park benefits from the cycle infrastructure on Botley Road and access to paths to the rear/landscaped</li> </ul>	<ul style="list-style-type: none"> <li>Create high-density urban living with good provision and access to public open space.</li> <li>Maintain a vibrant mix of uses.</li> <li>Refers to the West End SPD.</li> <li>Contribute to the knowledge economy.</li> <li>Enhance public realm opportunities particularly around the waterways.</li> <li>Enhance accessibility and permeability of the area through good pedestrian and cycle links.</li> <li>Support the redevelopment of Oxford railway station to create an easy and attractive transport interchange</li> </ul>	<ul style="list-style-type: none"> <li>Oxpens – minimum no of units for residential development plus employment land to be delivered on the site.</li> <li>Osney Mead - employment led plus some residential.</li> <li>Oxford Railway Station and Becket Street Car Park – mixed use scheme alongside transport hub.</li> <li>Island Site, the land between Park End and Hythe Bridge Street mixed use scheme.</li> <li>Worcester Street Carpark mixed use scheme.</li> <li>Oxford Centre for Innovation – economic uses.</li> <li>Botley Road Retail Park - economic uses.</li> </ul>	<u>Preferred Options:</u> <u>A.</u> Designate area of focus ensuring policy sets out the relationship of this area to its landscape setting, sustainable locations as served by both road and rail and seek to ensure alignment with West End SPD principles.  <u>B.</u> Include detailed site development guidance for sites listed.  <u>Alternative Option:</u> <u>C.</u> Include a different combination of sites within the area of focus or for different mixes  <u>Alternative Options (considered detrimental):</u>

<b>Oxford Centre for Innovation.</b> <b>HELAA #448</b>	connecting to Hinksey and Osney Mead. Once inside the retail park, it is a car dominated area and a difficult environment to navigate on both foot or bicycle.	<p>between rail, bus and active travel.</p> <ul style="list-style-type: none"> <li>• Reduce car parking to make more efficient use of land.</li> <li>• Careful consideration of heights of buildings, being mindful of views into and out of the historic core.</li> <li>• Careful consideration of the landscape setting of Oxford.</li> </ul>		<u>D.</u> Do not designate the area of focus  <u>E.</u> Do not allocate sites within the area of focus
<b>Botley Road Retail Park.</b> <b>HELAA #607</b>				
<b>Units 1 and 2, 135-137 Botley Road.</b> <b>HELAA #607</b>				

## Central and West Area proposed development sites outside of Area of Focus

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Site name and address and HELAA Number	Existing use and type of location	Consideration for allocation including constraints and landowner intention	Options
<b>Canalside Land Jericho.</b> <b>HELAA #11</b>	Former boat yard, suburban area	Landowner interested in residential scheme, boat yard, community centre and public square	A. Allocate for mix of uses B. Do not allocate
<b>Faculty of Music.</b> <b>HELAA #21</b>	Administrative and educational uses, city centre location	Landowner interested in residential use if uses move to the ROQ	A. Allocate for residential and educational uses B. Do not allocate
<b>Manor Place.</b> <b>HELAA #31</b>	Former tennis courts, abandoned allotments and an orchard. Very sensitive location as it is close to Holywell Cemetery and within the Central Conservation Area	Landowner interest in residential development	A. Allocate for residential development B. Do not allocate

<b>Oriel College Land at King Edward Street and High Street. HELAA #44</b>	Retail and office uses City Centre	Student accommodation and or residential development and town centre uses	A. Allocate for mix of uses B. Do not allocate
<b>Sites adjacent to the east of Osney Bridge to the north and south of Botley Road. HELAA #613</b>	Riverside Hotel and adjacent area, edge of city centre	Landowner interest in residential development. It depends upon the policy position in the draft plan about the protection for hotels.	A. Allocate for residential B. Do not allocate C. Continue to protect hotels
<b>Site to the south of Cripley Place. HELAA #614</b>	Residential area with scope for redevelopment, suburban area	Landowner interest in redeveloping area with higher densities	A. Allocate for residential B. Do not allocate because landowner interested in only student accommodation
<b>Osney Warehouse and St Thomas School. HELAA #616</b>	Buildings currently used by a range of SMEs and arts organisations	Landowner interest in redeveloping area for residential and other uses	A. Mixed use development B. Do not allocate C. Allocate for employment
<b>St. Stephen's House, 17 Norham Gardens. HELAA #609</b>	Currently in use as student accommodation. Suburban area.	Landowner interest in redeveloping for student accommodation and academic uses.	A. Allocate for residential (student accommodation) and academic use only. B. Do not allocate
<b>1-3 Cambridge Terrace. HELAA #611</b>	Site currently in employment (office) use. Located within City Centre.	Landowner interest in redeveloping for student accommodation and employment uses.	A. Allocate for mixed use. B. Allocate for residential (student accommodation only). C. Allocate for employment D. Do not allocate

## City-wide infrastructure needs

- 8.15 Oxford's small compact nature means that infrastructure needs for the city don't always fall neatly into one of the four areas and some infrastructure needs are city wide. This is particularly so in the case of digital infrastructure, cycling and public transport schemes.

### Primary healthcare

- 8.16 We recognise that many of the primary care facilities are poorly suited to the needs of patients, and we expect the Berkshire Oxfordshire Buckinghamshire Integrated Care System (BOBICS) to produce a clear set of priorities for the city which will be incorporated in the final version of the local plan. Discussions with the ICS will continue throughout the plan making process to ensure the appropriate level of provision to meet need is properly addressed.

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### Utilities and digital

- 8.17 We are aware that over the coming years there is likely to be a greater demand for electricity usage in the city, such as to heat our homes (as we transition away from fossil fuel heat systems) as well as to charge electric vehicles, and this could put additional burdens on the power grid. If new development is to come forward in a timely manner, there must be sufficient electricity available to provide for the city's additional needs and to enable decarbonisation of the built environment. Promoting decentralised power systems through onsite renewable energy generation wherever possible could help to reduce burdens on the wider grid, but another key focus in preparing the Local Plan 2040 is on continuing to undertake early and ongoing engagement with utility providers, allowing them to proactively plan to meet the demand generated by new development and enable the wider shifts in electricity usage that will be necessary for the transition to a net zero city.
- 8.18 For digital infrastructure, Oxfordshire County Council now recommends that planning policies require the provision of fibre connectivity in new development – it is recommended that this is included in the new Local Plan, subject to it being demonstrated to be viable.

- 8.19 Alongside physical connections throughout the city, digital connectivity is of increasing importance to how we live, work and communicate with each other. Strong, high quality digital infrastructure can also support jobs and businesses, particularly technology and research, which form a strong part of Oxford's economic profile. Digital access (or lack of it) was an issue that was highlighted by the recent covid pandemic and social distancing, which has brought about a greater shift towards home working for many, as well as greater reliance on internet connectivity for other practices such as learning and shopping. Despite the increased shift to digital ways of connection, there are still communities who do not benefit from high quality digital connectivity, particularly those in more deprived areas of the city.
- 8.20 National policy and supporting guidance emphasise how local authorities should support high quality digital/communications infrastructure which reduces the need for locally set policies as any local policy would be unlikely to add much variation on this, thus our preference would be not to have a specific local policy. Where there are specific local contextual issues arising from new infrastructure, e.g., heritage or biodiversity, the relevant policies elsewhere in the plan would ensure any specific concerns in relation to these topics are addressed. Regarding digital connectivity in residential developments, we would wish to ensure that new developments consider digital connectivity by including this as a principle within the design checklist rather than having a specific policy.

Policy Option Set DS1: Digital Infrastructure				
	Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach	Related options, conclusion
a	<b>Not having a specific local policy, rely on national policy or future national development management policies but include digital connectivity with the design checklist.</b>	The NPPF has set out important and extensive advice and guidance in relation to digital communications equipment and how applications involving this are to be treated. Any local policy is unlikely to add much variation on these issues, other than flagging local context that may need to be considered as part of their design.	Does not include any reference to Oxford context such as Smart City and Oxford- Cambridge Arc.	Preferred Option

<b>b</b>	<b>Have a specific policy, setting out requirements for the provision of digital infrastructure on all new development to meet average digital connectivity needs for all occupants (including working/learning from home). Policy would set out expectations in relation to full-fibre broadband connection; the need for appropriate flexibility with the design of infrastructure to enable occupants to utilise a range of operators and to build in resilience to future changes in market/technology.</b>	<p>This approach would extend the requirement to all new development (not just majors).</p> <p>Current policy has been effective and worked well according to the Oxon Digital Infrastructure Partnership. Properly responds to NPPF advice.</p>	<p>There are still some pockets of the city which are poorly served by broadband and therefore certain parts of Oxford could be disadvantaged.</p>	Alternative Option
<b>c</b>	<b>Going further than required by the NPPF Future-proofing full-fibre &amp; 5G supported &amp; promoted. Need to work with DIP. link importance</b>	<p>Will seek to address areas of poor coverage, understand spatially these locations.</p> <p>Opportunity to link provision with 'social-inclusion' agenda. Provides greater Oxford specific context. Benefits in linking with Smart City concept and Oxford Economic</p>	<p>The delivery of digital infrastructure is significantly dependent on the DIS partnership and key providers and the investment from the private sector.</p>	Alternative Option

	<b>to Smart City concept / data collection. Include reference to shared masts.</b>	Strategy and importance of digital infrastructure to serve the city's key sectors and areas of deprivation. Some new providers are interested in focusing provision in areas of deprivation.		
d	<b>Set out that permission will be granted for new electronic communications</b>  <b>Infrastructure where evidence addresses issues such as: rationale for location; accordance with national policy; no adverse impacts of design on sensitive areas (e.g. heritage, ecology, green belt); no adverse impacts on health; no adverse interference with existing infrastructure or telecommunications signals.</b>	Explicitly sets out a positive stance towards improving the quality and capacity of electronic communications infrastructure in line with national policy, but ensures that this happens carefully, with consideration of important issues that could otherwise bring harm to the environment, existing infrastructure/communications signals and people's health and wellbeing.	This policy wording is likely to be repetitive of national policy, a lot of the issues highlighted are already set out in national policy and will likely be transposed into national development management policies.  More specific, local considerations around design and how this impacts sensitive areas e.g. heritage, ecology or green belt could be addressed through those specific policies.	Alternative Option (considered detrimental)

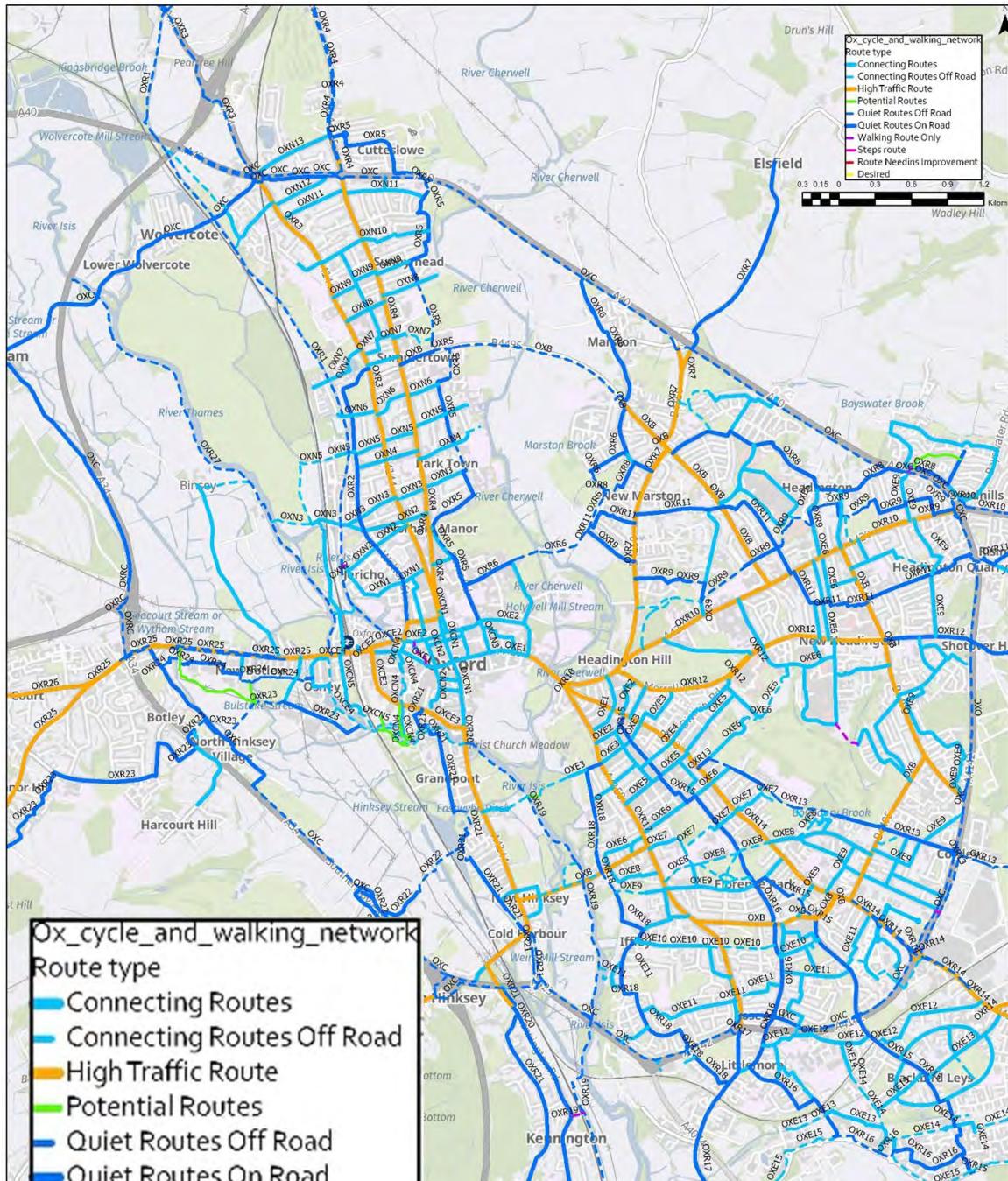
## Cycling and walking

8.21 Figure D8 below shows the existing and proposed cycling and walking network in the city.

<https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/active-and-healthy-travel>

This is key infrastructure that needs to be delivered over the Plan period if the target of modal shift away from the private car is to be realised.

## Oxford Cycling and Walking Network for LCWIP



*Figure D8: Oxford Cycling and Walking Network for Local Cycling Walking Implementation Plan*

## Public transport

- 8.22 Public transport across Oxford is being prioritised by the City Council's support for 'Core Schemes', input to the three-year Enhanced Bus Partnership and introduction of a new fleet of battery-electric buses, part-funded by the Government's ZEBRA grant. There are three elements to the Core Schemes; expansion of the ZEZ pilot to cover the whole city centre, introduction of a workplace parking levy and implementation of six traffic filters at key points on the bus network. Consultation on the expanded ZEZ and WPL will take place over the autumn and a Cabinet decision is scheduled for spring 2023. The WPL is subject to Secretary of State approval and will therefore not come into effect before 2024. Given the pressing need to order 159 new buses by the end of December, it is proposed to progress the traffic filters by use of Emergency Traffic Regulation Orders. The new buses will be delivered into service between October 2023-April 2024.

## Education (SEND and secondary)

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8.23 Oxfordshire County Council has indicated that there are new SEND schools being provided elsewhere in the county at present, which will in part serve Oxford city, and there is limited scope to provide new SEND provision within Oxford at the current time. It is also understood from discussions with Oxfordshire County Council that there is sufficient capacity within the city's secondary schools to meet the needs of housing growth within the City's boundaries.

## Oxford Electric Vehicle Infrastructure Charging Strategy (OxEVIS)

- 8.24 This [strategy](#) sets out the electric vehicle (EV) charging infrastructure Oxford will need between now and 2040, to enable those dependent on car use who live, work and visit the city to switch to electric vehicles. This strategy is needed to support the Government's announcement to stop sales of new petrol or diesel cars and vans by 2030. It will be undertaken to keep in step with the city's ambition to achieve its net zero carbon target by 2040.
- 8.25 The Strategy adopts the [Oxfordshire Electric Vehicle Infrastructure Strategy \(OEVIS\)](#), including a solutions hierarchy aimed at keeping pavements accessible. OxEVIS contains a commitment to support the highways

authority in the delivery of cable channels and other safe pavement crossing solutions to support suitable households without dedicated offstreet parking to charge a vehicle parked on the highway from a home charging unit. Defined policy options will be developed under the implementation plan by the end of FY2023. This will include a commitment to make infrastructure available within a reasonable walking distance for Oxford households.

- 8.26 There are no specific policy options around the provision of EV charging in new development as this is now required by the updates the building regulations.

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