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Oxford Central (City & University) Conservation Area

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#### 1.1 Statement of Community Engagement

- This conservation area appraisal has been the subject of extensive consultation. The responses to this consultation have shaped its content and conclusions.
- This appraisal has been subject to public consultation three times.

#### First draft consultation (May-October 2018) 1.1.1

- A Stakeholder Workshop was held as a scoping exercise on 9 May 2018 with key historic environment stakeholders in the city. Stakeholders included:
  - Historic England
  - Oxford Civic Society
  - Oxford Preservation Trust
  - Oxfordshire Architectural and Historical Society
  - University of Oxford.
- During a wide-ranging discussion of the character, significance and management of the conservation area, the thematic approach which was later followed in the draft document began to emerge, including:
  - The commercial and retail character of the conservation area
  - Variety and contrast
  - Continued expansion of the colleges
  - Intangible significance of views planned, panoramas, vistas, glimpsed, elevated public views, etc
  - Importance of setting
  - Significant historic defences
  - Postwar architecture
  - Balancing demands: retail, commercial, residential, academic, tourism.

Further to the workshop, in May and June 2018 additional meetings were held with the Estates Department of the University of Oxford, and a representative of the Colleges (provided by the Estate Bursars' Committee). Discussions were wide ranging, and included sourcing ashlar stone, design life of later buildings, additional student accommodation, and security and privacy considerations.

#### 1.1.2 Public consultation (3 September - 26 October 2018)

The Council published a first draft of the appraisal on its website for consultation. This initial document was an analysis of character and appearance of the conservation area, explaining its significance as a series of themes and its character by dividing it into seven Character Zones. Mapping was presented in the form of a multi-layered pdf.

## 1.1.3 Publicity

- The Council publicised the consultation by:
  - Issuing a press release to the Oxford Mail, Oxford Times (article 1 November 2018) and BBC Oxford
  - Using Oxford City Council's Twitter and LinkedIn social media accounts
  - Emailing approximately 250 relevant residents' associations, local amenity groups, etc.
  - Direct outreach to relevant University of Oxford and college leadership, including 42 colleges in the conservation area
  - Sending letters to residents in the conservation area, amenity groups and other outreach groups for whom no email was held
  - Placing posters in libraries, leisure centres, council notice boards and parks.

### 1.1.4 Events

Exhibitions and information events were held at the Town Hall on Saturday 8 September 2018 and Saturday 20 September 2018.

# **Consultation:**

Oxford Central (City & University) Conservation Area 3 September to 26 October 2018





## Your views matter

Oxford City Council are undertaking an appraisal for the Central (City & University) Conservation Area which covers the historic core of the city. The purpose of this is to understand the character and significance of the area and to establish a strong basis for future management and decision making.

#### You can help us to:

- · Define its character and significance
- · Tell us about the places that you value in the conservation area
- · Identify challenges and opportunities
- · Future management of the historic environment

### You can take part by:

- Visiting us: Oxford Town Hall
   Saturday 8 September 10 2pm
   Saturday 20 October 10 2pm
- · Writing to us: Email: heritage@oxford.gov.uk
- · Commenting at: www.oxford.gov.uk/oxfordcentral





Building a world-class city for everyone

Consultation Poster (OCC)

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Comment	Response
A poor structure and usability	A document restructured by separating out the Character Zone assessment into individual documents  Re-ordering the main appraisal document, beginning with a revised overall Character Statement  Making clearer the purpose and relationship between the different parts of the appraisal
Difficulty in reading the mapping	Mapping revised and resolution improved
Factual errors and typos	Corrected
Need to expand the boundary of the conservation area (especially in the West and to include the University Science Area	Boundary review undertaken (see section 1.3 below)
Need to revise the Character Zones to better reflect the nature of the conservation area, for example the University Zone and the Principal Streets Zone	Zone structure was reviewed. Thematic zones have been retained but minor adjustments and some significant modifications have been made, including changes to the University and Principal Streets Zone and the creation of a Castle Zone

Support for preservation of the skyline	Addressed in the final report as part of the Management Guidance and Design Advice
Concern about the architectural quality of new development and its impact on historic character, especially in the West End	Addressed in the final report as part of Design Advice
Concern about how the expansion of college accommodation is affecting the character and appearance of parts of the conservation area	Addressed in the final report as part of the Management Guidance and Design Advice
Desire for more and better quality public and green space	Addressed in the final report as part of the Management Guidance and Design Advice
Traffic causes harm to the character and appearance of the conservation area, and created pollution, especially in locations such as High Street, St Aldates and Beaumont Street	Addressed in the final report as part of the Management Guidance
Better provision for cycling and cyclists	Addressed in the final report as part of the Management Guidance
Concern about the future of the covered market	Addressed in the final report as part of the Management Guidance
Concern about the future of retail and shopping	Addressed in the final report as part of the Management Guidance
Concern about the impact of tourism on the character and appearance of the conservation area	Addressed in the final report as part of the Management Guidance
Concern about the degradation of the public realm: clutter, lack of cleanliness, rubbish	Addressed in the final report as part of the Management Guidance

## 1.1.6 Boundary review February - March 2019

- Many respondents to the first round of consultation argued that the boundary
  of the conservation area should be reconsidered. In response to this, the City
  Council and its consultants undertook a review in the locations identified by
  respondents:
  - University Science Area
  - Keble Road Triangle
  - St Thomas and Hythe Bridge Street
  - Former Radcliffe Infirmary site
  - Boundary along the southern bank of the Thames, near Folly Bridge.

## Stakeholder workshop (14 February 2019)

Oxford Central (City & University) Conservation Area

- Stakeholders attended a workshop on 14 February 2019 at the Town Hall.
   It was attended by representatives of the Oxford Preservation Trust, the
   Oxfordshire Architectural and Historical Society, the University of Oxford and
   Nuffield College. Historic England were unable to attend but sent comments.
- Opinions were divided, particularly for the University Science Area, Keble Road Triangle, and St Thomas'. There were concerns that the character and standard of architecture was not of a comparable quality to the remainder of the conservation area, and that designation may prevent or impede expansion or replacement of the building stock.

### **Public Consultation**

- Public consultation on the Boundary Assessment Consultation Report ran from 4 February to 4 March 2019 on the Council's website, together with a questionnaire seeking views on the possible areas for extension.
- 18 responses were received, either as completed questionnaires or detailed reports; 12 of these were supportive. The remaining 4 cited issues concerning redevelopment and alterations, and lack of comparability with the existing conservation area.

## 1.1.7 Council Actions

- Following a review of the consultation report and responses received, the City Council resolved on 13 March 2019 to extend the conservation area boundary to include the Science Area and additional parts of St Thomas and Park End Street, because their historical character and appearance is consistent with that of the conservation area, as identified in the draft appraisal. A notice to this effect was published in the London Gazette.
- The other areas were determined to have insufficient historic or architectural character or a character that was not consistent with the conservation area, and no boundary changes were made in these places.

# 1.2 Management Guidance and amended evidence base

- Stakeholders attended a further workshop at the Town Hall on 23 May 2019. Representatives of the following attended:
  - Historic England
  - Oxford Civic Society
  - Oxford Preservation Trust
  - Oxfordshire Architectural and Historical Society
  - University of Oxford
  - The Colleges.
- There was a wide-ranging discussion on conservation area management (transport, public space and accessibility, mixture of uses, tourism future of retail) and design (materials, forms, details, skyline). The ideas and suggestions were taken into consideration in drafting the Management Guidance Recommendation and Design Advice sections of the final draft appraisal report.

# 1.3 Management Guidance and Design Advice (February – April 2022)

• In accordance with best practice and Historic England's guidance on the designation and management of conservation areas, Management Guidance and Design Advice was produced in early 2022. This was informed by the earlier fieldwork and assessment of the issues, threats and opportunities within the conservation area and matters raised in the earlier consultations.

# 1.4 Purpose of the Management Guidance and Design Advice

## 1.4.1 Management Guidance

- The Management Guidance helps to address the issues and opportunities in the conservation area that were identified during Phase 1 of the project and provides guidance and actions to address them.
- The main issues identified were:
  - The lack of and contested amount and appearance of public open space
  - Negative impact of traffic
  - Balancing the historic and distinctive mix of uses
  - Setting and views
  - Archaeology.

## 1.4.2 Design Advice

 The Design Advice aims to guide applicants, designers and owners on how to appropriately design new development and alterations that respect and protect the setting of the conservation area.

- The Design Advice covers the following:
  - The importance of understanding the site and context
  - Architectural style and authenticity
  - Sustainability and climate change
  - Plot boundaries
  - Addressing the street
  - Height and roofscape
  - Public and green space
  - Materials
  - Painting
  - Basements, foundation and services
  - Rear extensions and backland development
  - Shopfronts
  - Lighting.

## 1.5 Consultation

- For this stage, a six-week open consultation ran from 18th February to 1st April 2022 to gather feedback on the Management Guidance and Design Advice documents. An online questionnaire on the Council's consultation portal was used to collect feedback.
- In addition to this, another session for members of the public was undertaken on 10th March 2022 from 17.30 pm to 19.00 pm. A similar exercise was also performed with key stakeholders and landowners, including Oxford University and Colleges, Oxford Preservation Trust, Oxford Civic Society, Local Resident Associations and local business forums on 16th March from 14:00 to 15:30 pm. These sessions provided an opportunity to meet the project team, ask questions and provide feedback.

Statement Management guidance Design advice Purpose Consultation Conclusion

## 1.5.1 Publicity

- The Council publicised the consultation by:
  - Press releases in the local and professional press
  - Fortnightly social media updates using Facebook, Twitter, Instagram and Linkedin
  - Publish the release on OCC website, intranet and also in Council Matters to reach staff
  - New text added to the heritage pages on the Council's website
  - Posters put up around the conservation area
  - Emails to contacts on the Strategic Planning Consultation Database
  - Emails to resident associations and local heritage interest groups as well as national heritage groups such as Historic England, The Victorian Society and the Twentieth Century Society.

## 1.5.2 Events

- Online portal questionnaire 18th February 1st April 2022
- A total of 14 responses were received, five through the online portal and nine
  as detailed responses via email. Below is a summary of the key responses
  received firstly for the Management Guidance, followed by the Design Advice.
  Responses shown in this section are presented anonymously.

Section	Comment	Response
7.2 Streets, public spaces and green spaces	Increase pedestrianised public space through key stakeholder collaboration	Noted. This point has been reinforced in the document
	The design of streets and public spaces should be bespoke	We agree this is a principle related to context and embedded in the Management Guidance and Design Advice
	Lack of reference to the Green Belt, green spaces and rivers	Reference to the Green Belt has been made where appropriate, but this document is focused on the heritage significance of the conservation area and it's management whereas Green Belt matters are dealt with in the Local Plan. The significance and management of green spaces and rivers has been incorporated
	Ensure a more effective approach to tree management	Reference is made to this in the Management Guidance
	Would welcome guidance for streets, particularly in regards to street furniture, material and lighting	This is covered in the Design Advice section
	Street repairs and resurfacing should respect the existing historic features	This is covered in the Design Advice and Management Guidance chapters.

	Improve the safety of pedestrian and cycle routes	This document is focused on the heritage significance of the conservation area and it's management and so this would not fall within that specialism but the document does advocate for designing for all and achieving good quality streets and connections
	Improve access to watersides	Incorporated into the Management Guidance
7.3 Transport	Need to address management and design of street furniture such as cycle storage	Incorporated into the Management Guidance and Design Advice
	Worcester street car park should be added to the 'Key issues' section.	Included under 'Transport' in the Management Guidance
	Parking can impact the use of public spaces	Included under 'Transport' in the Management Guidance
	Potential to reference recent purchase of electric buses	We have not added a specific reference to electric buses but have made reference to EV charging points in the Management Guidance and Design Advice as this has an impact on the character and appearance of the conservation area
7.4 Uses	Text needed some clarity	This has been clarified in the text
	Use Class E may compromise the retention of retail uses in historic buildings	Noted

	Support Area of Special Control of Advertisements and stronger frontage policies	Noted
	Promote more creative uses in the commercial core, rather than just retail	This is more of a policy point
7.5 Setting and views	Greater clarification is needed to justify when a building can exceed the Carfax height of 18.2m. Concern this may set a precedent to buildings to stretch the rules	This has been clarified in the text
	Joint effort with other authorities is needed as the setting of the conservation areas extends beyond district boundary	Noted. The City Council receive consultations from neighbouring authorities where a proposal may impact on the setting of the Central Conservation Area and we will circulate the document to all neighbouring authorities
	Welcome the mention further studies similar to View Cone Study	Noted
	Designated views in the city centre need to be preserved	Policy DH2 of the Local Plan, the View Cones Study and Tall Buildings TAN are the mechanisms for managing the impact on important views

	The "Oxford High Buildings Technical Advice Note" is described as containing "a robust methodology, clear design guidance" This may be true but it has not been wholly effective in the City Centre	The TAN is used to guide development proposals and each development and site is considered on its merits, impact and justification
7.6 Archaeology	Minor Wording changes	Incorporated
7.7 Opportunity sites and areas of enhancement	Concerns that this section focuses on demolishing twentieth-century and 'ugly' buildings, rather than conservation	This has been removed as we felt it had the potential to be confusing and that it was not the role of this document to identify sites for development. The document does identify opportunities for enhancement however throughout
	An Article 4 direction should be applied in the conservation area	There would need to be sufficient justification for the need for restricting permitted development rights over and above those limited by the conservation area status. The City Council do not currently consider this is appropriate
	Preference is for redundant buildings to be re-purposed rather than demolished	Incorporated into Design Advice

Providing accessible open space as a condition of developing opportunity sites, needs to be amended	This section has been removed
Post-war development and the western fringe are singled out as separate sub-sections	Opportunity areas have been removed because there was concern this was confusing and this is part of the Local Plan and Development Management process
Structure needs to follow rest of document	Noted. This section now follows the same InDesign template
The Management Guidance fails to clearly identify that the Science Area diverges substantially from the typical uses established elsewhere within the Central Conservation Area; this is a working campus with negligible general public footfall other than to the University and Pitt Rivers Museums	The fact that the majority of footfall is the academic community rather than the general public shouldn't mean that quality of place is not as important. There are still a lot of buildings of historic interest in this area

There is a heavy emphasis on the aesthetics of the Science Area (specifically, the north side of South Parks Road), but with little to no dispensation for the site's operations as a working science campus, which must evolve in order to facilitate the latest scientific techniques and discoveries (which rely on ever more stable and tightly controlled environments).	This message is captured in the overview of character and significance in the Character Zone for the Science Area
The recommendation for development within the Science Area to be street-facing, with a formal and active elevation is unfeasibly prescriptive for any buildings intended to accommodate sensitive activities and with complex security requirements and in direct conflict with the advice within the Design Guide.	Specific design advice for the Science Area has been removed as we understand this is a distinctive area in terms of character. Each case will be decided on its own merits and unique site characteristics and the justification for the proposal will be taken into account within the planning process
The recommendation to maintain prevailing building heights does not acknowledge the ongoing requirement for flues or for the need for densification.	The challenge of retaining the presence of the experimental science research and teaching within the city centre as departments grow and their needs change is recognised in the University Science Area Character Zone

		With regard to flues, the Design Advice identifies the Science Area as a place where new flues may be appropriate, and provides further advice on how these should be designed
	Justification for the inclusion of certain streets in western Fringe	This is covered in the documents published to support the extension to the conservation area boundary approved in 2019
	Explain how sites are selected for enhancement	Specific sites have been removed
7.8 Implementation	Would welcome a stronger commitment to deliver it's aims and objectives	The City Council is one of a number of key stakeholders who have a responsibility to preserve the special character and appearance of the conservation area and thus whilst this Management Guidance sets out a series of recommendations for action, this is partly reliant on the action of other parties beyond the City Council's control. Nevertheless, this document sets out the City Council's aspirations and once adopted, will be a key communication tool setting out what is considered to be the steps to take to address the issues raised

Other	Issues, guidance and recommendations should be displayed on a map	We have sought to use mapping to convey important messages as much as possible using the layered map of information but due to the size and complexity of the conservation area, it is not possible to include the level of detail that would be helpful solely on a map
	Support the work on the conservation area appraisal.	Noted
	The map on the website 'Oxford Central Conservation Area Overview' shows the outdated boundary	This has been amended
	The maintenance of historic ironwork should be a priority	This has been incorporated into the Design Advice

	Confusion over the status and weight to be given to the Management Guidance and Design Advice in relation to the Local Plan	This has been clarified
	Would be helpful for the MPDG to map issues explicitly onto the relevant character areas and both should clarify that the principles and recommendations within should relate to the specific needs and interests of the different character areas	A note has been added to clarify this at the start of the Management Guidance section
8.1 Purpose and Scope of the design advice	The effects and definitions of good design are highly debatable. Requires details of requirements	We have sought to make the Design Advice clear and concise and clearly related to and informed by an assessment of the issues and opportunities within the conservation area
8.2 Making an application	The recommendation to seek pre-application advice does not acknowledge the associated cost, nor the commitment to deliver this paid-for service efficiently	Noted. We strongly believe in the value of the pre- application process and fees are reviewed regularly

Address how pre application dvice can be sought from ther stakeholders	Recommendations have been added to engage with Historic England for pre-app and to engage with local amenity societies
Heritage impact assessment hould only focus on heritage ssets whose significance is otentially affected	Agree. This has been clarified. Change in 8.2 of Design Advice
This section unduly focuses on the content of a heritage tatement and does not dentify the importance of comprehensive and well-ounded application	Do not consider any amendments needed to this section – it highlights the need to comply with validation & NPPF requirements, and it is right to focus on content of HS
No reference to the onsideration required under he Local Plan for the impact in the view cones	This has been added
Views analysis: This ection needs considerable larification. As currently vorded, it is implied that ownscape/landscape isual impact assessments nd accurate visual epresentations are not eccessary	This section has been clarified and expanded
The sound of the s	eritage impact assessment and only focus on heritage issets whose significance is obtentially affected  his section unduly focuses on the content of a heritage fatement and does not lentify the importance of comprehensive and well-bunded application  or reference to the consideration required under the Local Plan for the impact on the view cones  iews analysis: This rection needs considerable arification. As currently rorded, it is implied that the bunded application are under the large sual impact assessments and accurate visual representations are not

8.3 Spirit of place: Understanding site and context	There is scope for a middle ground between 'restrained' and 'landmark' development	Agree and incorporated
8.4 Architectural style and authenticity	Modernist movements of design principles are not appropriate for historic settings	This is not necessarily true and it depends on the response to the context and quality of architecture and materials. The Design Advice section expands on this
8.5 Plot boundaries	The process of restoring historic plot divisions is overly prescriptive	This is an advice document and we believe this is an important element of heritage significance
8.6 Addressing the street	Activity at street level is not feasible for all areas. E.g., Science Area	It is an important core principle and this should be the starting point for all development unless it can be justified why this is not possible
8.7 Height and Roofscape	Support the need for a policy on space and views at street level	Noted
	Guidance is vague and encourages developers to build to as high as possible. Increasingly concerned about the way in which applications are justified in terms of the existing high buildings policy and the use of view cones	The guidance has been refined so it is not vague and it echoes that in the Local Plan which has relevant policies in building height

	No mention of photovoltaic panels or guidance how these can be achieved in a sympathetic manner	This has now been included
	The guidance must recognise the cumulative effect of square and monolithic structures and how the closing of gaps impacts historic roofline	This point has now been incorporated
8.8 Public and green spaces	Limited reference to tree management	Reference has been made in the Management Guidance
	Omit reference to creation of new public space and green space as it contradicts nature and character of conservation area	Not always. We believe if an area presents itself as an opportunity for new, high quality public and green space then this is positive and will be considered amongst all other matters including the impact on the character and appearance of the conservation area
	Support the creation of green spaces and traffic free spaces	Noted
	Preserve and enhance existing green spaces, rather than creating small patches in new developments	Agree that any new green space should be meaningful and of a high quality if it is necessary. This has been incorporated into the text

8.9 Sustainability and climate change	Concerns that current wording implies all buildings within the conservation area need to apply for consent for internal alterations	This has now been amended to be clearer
	Discussion whether energy efficiency is more important that retaining some historic features and greater reference should be made to incorporate sustainable energy design.	The text seeks to cover some of these issues and objectives
	Clarify that retaining historic buildings is inherently sustainable.	This has been amended
8.10 Materials and painting	Dismissal of certain materials suggests that modern design would not be acceptable	We have refined the text and stated that other materials would need to be justified
	The use of glass reinforced concrete should be cross referenced with sustainability advice	We have removed specific reference to GRC
	Suggestion to publish a list of acceptable materials and colours, e.g. roof materials	Suggestion noted and we have made reference to commonly used and traditional materials in the conservation area but each case is decided on its merit and we would seek to consider all materials, subject to the justification for using them and for them to be appropriate to the context

8.11 Basements, foundations and services	Reconsider the wording of 'Unacceptable effect on nationally significant remains'	'Unacceptable,' replaced with 'harmful'
8.12 Rear extensions and backland developments	Recommended for where this allowed, there must be adequate space for bike and bin storage	Agree and covered in the design advice and within the Local Plan policies and guidance
8.13 Shopfronts	Should be updated to refer to TAN on shopfronts	Reference has now been made to the TAN
	Supports improving frontage quality	Noted
8.14 Lighting	Add the subheading "Reason"	We have changed the structure and no longer include, 'Reason' as a sub- heading
	Supports the implementation of illumination through a coordinated plan	Noted
Other	There is a need for the Management Guidance to have a built-in process for monitoring its effectiveness	Agree. Historic England advise that conservation area's should be reviewed, ideally every 5 years to assess their condition where resources permit
	No guidance on the density of any new development	This covered by the Local Plan and guidance notes

The documents address various relevant issues, however some are still overlooked e.g. traffic control, signage	We have sought to include reference where appropriate and some of these issues are specifically referred to in the Character Zone chapters
Limited amount of illustrations and examples of good practice	Noted and more have been added
It would be useful to have greater clarity on what development will require planning permission, or can be carried out under permitted development rights	We do not consider the Management Guidance or Design Advice is the right document / forum to address PD rights, but have signposted to relevant planning information webpages

'Good design' is today
determined by planners, the
architectural profession, and
'design review panels.' It is not
democratic - ordinary people
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Comment: 'Good design' is
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derive from the familiar

Do not agree. Public and stakeholder consultation is a key part of the planning process from policy and guidance documents to planning applications

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#### 1.5.3 Public online drop-in sessions

A session for members of the public was held on 10th March 2022, on Zoom. Six people attended the session. After the discussion, the following themes emerged.

Theme	Response to attendees
Concern about how well the consultation was advertised and the time available to respond to the consultation	The consultation was advertised through a wide variety of means including press releases, social media, banners on council website, posters and communications with stakeholders. Emails were sent to those for whom we have an email address. Letters were posted to all others
Local news coverage not as comprehensive as it was for Phase 1	A press release advertising that the consultation was live and was issued on Monday 21st February. Details on how to take part were also included in the various advertisements
Residents who live in the conservation area should be considered by the Council as key stakeholders.	We agree on the importance of residents living within the area. A specific briefing note was prepared for the Resident Associations and above that, it can be hard to identify all residents which is why posters around the area and within local facilities and communications to local interest groups were produced
Have the consultation responses received during Phase 1 been acted upon	Yes, all where relevant and appropriate. A boundary review was undertaken and the conservation area was subsequently expanded to include St. Thomas' and the University Science Quarter. Links to the latest draft documents were sent to the attendees in the call

The policies contained within the documents are too vague, e.g. limited reference to heights of buildings and the City's roofscape.	Officers emphasised that the management Guidance and Design Advice aim to amplify national and local policy. But agreed that the documents need to be useful tools for managing change in the conservation area. Links to the High Buildings TAN and Oxford View Cone Study were posted in the zoom call
Will there be a Management Plan for the North Oxford Victorian Suburb Conservation Area (NOVSCA)	Historic England recommended a review of conservation areas and during this process, the production of a Management Plan will be considered
The brevity of the documents was noted as a positive, as was the quality of writing.	We are pleased to hear positive feedback
The Management Plan recommends adopting a Shopfront and Advertising Guide.	Windsor was given as a good example. The recommendation will be passed onto the planning policy team

## 1.5.4 Stakeholder Workshop

- A stakeholder workshop was held on 16th March 2022 with key historic environment stakeholders. Stakeholders included:
  - Oxford Civic Society
  - Oxford Preservation Trust
  - Oxford University
  - Oxford Architectural & Historical Society.
- Topics that were addressed in the session:
  - How this document relates to the Local Plan
  - The relationship with this document and the City Centre Action Plan
  - Whether an Article 4 Direction will be applied in the conservation area
  - Climate change and redundant buildings.

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## 1.6 Conclusion

- Council officers have reviewed all feedback from the consultation and made responses throughout this report.
- The council has used the information gained from the consultations to make amendments to the conservation area appraisal where appropriate.
- We expect the conservation area appraisal to be adopted in November 2023.

