

Introduction

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

This Consultation Statement sets out how Oxford City Council undertook consultation on its Oxford Local Plan 2042 Preferred Options document between 27 June to 8 August 2025. This consultation stage was the Regulation 18 consultation and followed the requirements of Regulation 18 of the Town and County Planning (Local Planning) (England) Regulations 2012. The consultation was also carried out in accordance with the commitments in Oxford City Council's Statement of Community Involvement in Planning, which sets out how we will involve the community in the planning process.

This consultation statement covers:

- (i) Which bodies and persons were invited to make representation under Regulation 18,
- (ii) How those bodies and persons were invited to make such representations,
- (iii) A summary of the main issues raised by those representations, and
- (iv) How we intend to address the main issues in the Local Plan.

Following the Preferred Options consultation, the decision was made amend the plan period to 2025-2045, rather than 2022-2042, on a number of technical grounds. While the evidence base is being updated to align with this plan period, all representations and comments received to date remain valid and will be taken into consideration for the production of the final submission (Regulation 19 stage) draft.

One of the main principles of the planning system is that local communities and stakeholders should be involved from the outset in the preparation of planning policy documents.

This statement has demonstrated how Oxford City Council has prepared the proposed Oxford Local Plan 2045 in accordance with consultation regulations. Extensive community engagement and stakeholder consultation has been undertaken across each of the main stages of plan preparation including main issues and preferred options. Comments have been received on the proposed plan, Sustainability Appraisal and the plan's evidence base. These representations will be taken into careful consideration and will inform the submission draft of the plan, including amendments to the contents where appropriate.

Local Plan Timeline

Early Engagement Survey (March/April 2025)

The early engagement survey was designed to ask a series of questions to assess to what extent the public and businesses deem certain topics important for the Local Plan to influence and prioritise. This survey was designed to preview certain topics that are prevalent in Oxford City and that can be addressed within a Local Plan. The City Council was also keen to involve those who might not normally engage with planning.

This was a smaller scale exercise as it would build upon the findings and evidence established for the 2040 plan. The compressed timescale meant that a small-scale engagement process (relative to the previous Issues Stage of the Local Plan 2040) was put in place, as much of the findings and evidence base that the withdrawn plan was built upon was considered to still be valid. It would also help us in not losing the momentum generated by the work of the previous plan.

As with the Issues stage for previous plans, this early engagement exercise is not a statutory stage of consultation; it is in addition to the formal requirements (see below). This additional stage was incorporated into the project timetable because it was felt that early engagement, before any policy approaches are drafted, allows people the best opportunity to shape the plan as it develops.

There were seven main topics screened into the survey to gain a sense of how important these are to the respondents and what should be a main focus for the preferred options consultation stage of the Local Plan. The consultation survey was open for six weeks, running from 17 March to 28 April 2025. It was distributed via the Oxford City Council website, social media, press releases, the Oxford City Council newsletter, email lists, and posters in libraries and community centres.

[Early Engagement Report Local Plan 2042](#)

Preferred Options (Regulation 18) stage consultation (June/August 2025)

The main consultation document was the First Draft Oxford Local Plan 2042. The draft policies presented in the document are what we have identified as the preferred options, which is the approach that we consider will bring about the most beneficial outcome for a particular subject area when compared to the other possible alternatives. The alternative approaches considered were set out in our Background Papers.

The consultation document was approved by Cabinet on 18th June 2025. It had previously been considered at the Scrutiny Committee on 12th June. The consultation period, which ran from 27 June to 8 August 2025, was to specifically gain people's views on the policy options contained in the document as well as the background papers and other supporting evidence base. The outcomes from this stage of consultation, as summarised in this document, will help the City Council to prepare the Proposed Submission Draft Local Plan.

Proposed Submission Draft (Regulation 19) consultation (programmed for Spring 2026)

Following the analysis of comments on the First Draft Oxford Local Plan 2042 Consultation Document, we will draft a Proposed Submission Document and consult people for a further 6 weeks. Comments must be received in writing (or by email) as they will be submitted to the Secretary of State.

Examination (expected November 2026)

Following the Proposed Submission consultation, there is an opportunity to make minor changes to the Local Plan in response to the comments made, before the document, the supporting evidence base and comments received are submitted to the Secretary of State. An independent examination is then carried out. Those who have made comments to the Proposed Submission Document have the right to ask the Inspector to be heard in person at the examination. The Inspector will provide a Report concluding whether the plan is found sound. If the plan is found sound, any changes

recommended by the Inspector are made and the plan will be taken to Full Council to formally adopt it.

Preferred Options consultation process

Who was consulted?

The City Council conducted an extensive 6-week long consultation exercise between 27 June to 8 August 2025 to publicise the project and engage the Oxford community in the Preferred Options Stage of the plan making process.

The Preferred Options consultation aimed to directly involve residents, workers, employers, students and visitors to Oxford as well as statutory consultees, service providers and other stakeholders with an interest in Oxford.

Direct contact was made by email or post as follows:

- All residential addresses in the post code sectors covering Oxford (door-to-door delivery of questionnaires to approximately 46 000 households)
- Statutory consultees and Duty-to-Cooperate bodies (see **Appendix 1** for list of consultees)
- Additional local groups and organisations who were likely to be interested (see **Appendix 2** for list of consultees)
- Respondents from the Early Engagement Survey who wished to be kept informed of further stages in the Local Plan process (180 persons)
- All contacts on the Planning policy contact list, made up of persons and organisations signed up for updates on the Local Plan and related matters (400+ contacts);

Consultation methods

At this stage in the Local Plan project the material that was published was focussed on presenting the preferred policy options and the evidence base behind them. The consultation focussed on asking consultees whether they agreed with the Council's preferences for the policy options.

A leaflet questionnaire was distributed to all households and businesses through the city which could be returned using Freepost. In addition to being delivered to every household in the city, the leaflet was made available in the 7 local libraries and the central library.

Postal distribution problems unfortunately resulted in delayed leaflet deliveries for some parts of the city. We encouraged affected residents who made queries to return leaflets if they still wished to do so, and we continued to accept returned leaflets for several weeks after the formal closing date of the consultation.

The main element of the consultation was based online via the Council's online consultation portal. There were two questionnaire formats, the first was a 'short form' questionnaire that was based on the postal leaflets – aimed specifically at people who only wanted to provide high level comments or had limited time to respond. The second was an in-depth, or 'longer' questionnaire, through which it was possible to make representations on all the policy options and supporting documents that have been prepared for the plan, as well as general comments on the plan or the process. Representations were also accepted by direct email.

Consultation materials

To make this information accessible and to engage with a wide range of parties/people and levels of interest a range of materials were produced with different audiences in mind:

For people with 5-10 minutes to get involved:

- Leaflet (equivalent 2 sides of A3) with a freepost reply with basic information, a simple 'Strongly Agree – Strongly Disagree' questionnaire and some space for additional written comments;
- Online questionnaire based on the 5 main topics contained in the leaflet survey.

For stakeholders and those with more time/interest:

- First Draft Oxford Local Plan 2042 Consultation Document
- Draft Sustainability Appraisal
- Background Papers
- Structured online questionnaire (on the Council's Consultation Portal) to comment on Preferred Options Consultation Document (in addition to the option of submitting written feedback on the council website, by email or by post).

The materials described above were available:

- On the Council's website,
- In 7 local libraries and the central library,
- As hard copies on request

Promotion of the consultation period/Publicity

The Preferred Options Consultation was publicised through the following channels:

- Publication of an updated Local Development Scheme (LDS) in January 2025;
- Direct notification of residents and stakeholders as described above;
- Publishing information on the City Council webpage, and dedicated page on the consultation portal;
- The City Council's social media channels. There were three paid adverts on Meta (Facebook and Instagram). An economy advert which had 733 link clicks, 19,629 reaches and 36,478 impressions. A housing advert had 2,082 link clicks, 48,135 reaches, 89,658 impressions. And a biodiversity advert which had 873 link clicks, 14,835 reaches and 38,864 impressions. There were also three videos on TikTok. A housing video with 55,585 impressions, 40,318 reaches and 375 clicks. An economy video with 26,423 impressions, 18,851 reaches and 148 clicks. A video about sustainability with 22,728 impressions, 16,950 reaches and 103 clicks.
- A press release;
- Posters distributed for display on all community noticeboards in the city; and
- Briefings to Local Councillors.

Consultation events and meetings

We organised a number of face-to-face sessions – including in person 'drop in' sessions at various locations across the city, attended by officers of the Planning Policy team, and a number of online sessions that were subject and topic based for which there was a sign up/booking process for members of the public. These were widely advertised through the posters displayed on all community notice boards, as well as on our website. The events were scheduled as follows:

Date	Time	Location
Saturday 5th July	12.00 - 15.00	The Leys Festival
Saturday 5th July	14.30 - 16.30	Afternoon tea at Littlemore Village Hall
Monday 7th July	16:30 - 18:00	Online
Tuesday 8th July	10.00 - 14.00	Barton Community Centre
Wednesday 16th July	11.00 - 13.00	North Oxford Association
Thursday 17th July	11:00 - 12:00	Online
Sunday 20th July	9.15 - 12.00	South Oxford Farmers' Market
Wednesday 23rd July	10.45 - 14.15	Town Hall, Long Room
Saturday 26th July	10.00 - 14.00	Wolvercote Mill Community Café
Tuesday 29th July	17:00 - 18:30	Online

Structure of this Report

The report provides a comprehensive summary and analysis of all responses received during the consultation period. As outlined above, responses were collected through a short questionnaire and long questionnaire, both of which featured open text boxes to encourage broader comments on the plan and draft policies. In addition, comments and representations were welcomed via email, with statutory bodies also able to submit their responses via email. Each response has been carefully summarised and analysed by chapter and by each draft policy. Findings have been presented in two formats: data drawn from the responses to the quantitative survey from the short and long questionnaires, followed by a table of the summarised public written comments alongside officer responses where appropriate. Summarised responses from statutory bodies are presented in a separate table.

Supplementary information is contained in the appendices, including the list of statutory bodies consulted, local community and amenity groups that were contacted directly, and the leaflet posted to all Oxford City residents.

Chapter 1 - Introduction and Strategy

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Headlines for Chapter 1:

- Strong public voice for provision of more housing which should have adequate infrastructure to support development
- Any developments should be designed to the highest quality and sensitive to the historic environment
- General concern that the amount of development will put a strain on infrastructure, services, and amenities; such as transport, water and sewage, GPs, schools, green spaces, shops etc
- Infrastructure improvements should come before development, not after
- Concern about more cars and pressures on the roads as it's too expensive for people to live so they commute
- Concern that developers can dodge provision of affordable housing too easily through claiming lack of viability
- Some preference for lifting vast majority of regulations on building to allow for more development

- Desire for the Plan to actively address inequalities through tools like citizens assemblies, collaboration with community organisations, stronger mention of community-led and cooperative housing and neighbourhood plans
- Mansfield College, Worcester College and Lincoln College express support for the Chapter

All Public Responses – Draft Policy S1

Draft Policy	Topic	Summary	Response
S1	Support	We support policies S1-S3 and particularly welcome the commitments in policy S1 Spatial strategy to prevent new development in locations where it would have a negative impact on green infrastructure and take account of local historic context.	Support noted.
S1	What protection is there for green space outside f)	BBOWT supports S1 f) but asks what counts as “important”. What protection is there for green spaces that are not deemed important nor are they public open space nor floodplain?	The detailed approach to protecting GI is set out in Policy G1.
S1	Support but policy should be split in two	We support the general approach to the spatial strategy of the local plan and the aim to ensure that development within the City is located in the right places. Support the City’s ambition to address as much of its housing needs within the city boundary as possible, however, this should not come at the expense of the economic potential of development sites such as Oxford North. However, ONV remains of the opinion that the policy should be split into two, one setting out the spatial strategy and a second policy setting out the presumption in favour of sustainable development. Following withdrawal of the Oxford Local Plan 2040 there remains the need for co-operation between Oxford and the surrounding authorities to ensure that the approach to meeting the unmet housing need is agreed. While it is acknowledged that the consultation version of the plan does increase the amount of housing to be provided within the plan period there remains a level of housing still to be provided outside of the boundaries of the city.	The general support is welcomed. S1 as a whole deals with the spatial strategy, so there is no obvious advantage to splitting it. The Plan does not attempt to address housing need at the expense of existing employment sites, which it encourages intensification of.
S1	Templars Square	The redevelopment of Templars Square would make a significant contribution to meeting the aims of Policy S1/ the development proposals should be viewed as one of the most strategically opportunities for the city in terms of its ability to address and	Noted.

Draft Policy	Topic	Summary	Response
		positively contribute to the aims and objectives of the emerging Local Plan.	
S1	Change of use	We support this policy in principle. Whilst the general aims of sustainable development and growth in terms of the delivery of homes, jobs and services are positive, a strategic approach is needed to achieve these aims. This policy touches on a number of key themes without identifying opportunities for growth. We would like to see this policy set out the council's stance in favour of applications for the change of use from commercial to residential within city and district centres. Promoting development of this type would achieve a number of the aims set out in Draft Policy S1. We would also support a policy outlining sanctions against the keeping of vacant units, both residential and commercial, within city and district centres. The repopulation of urban centres will have a significant impact on housing need, preventing the further development of Oxford's green setting.	The support in principle is welcomed. The policy approach for employment sites is only to protect the very largest few in the city and district centres. Most employment sites in these locations are not protected. The Local Plan cannot set a policy with sanctions against vacant buildings.
S1 Spatial strategy		Capacity based approach must be flexible to a) Allow sites of all sizes that meet the presumption in favour of sustainable development to be allocated with the draft Plan; b) Allow sites of all sizes that are not allocated in the draft Plan, to come forward through the Development Management process (planning applications) where they meet the presumption in favour of sustainable development. It is also imperative that there are no restrictions on small sites coming forward through planning applications which support small and medium sized housebuilders. Those SME housebuilders will play a crucial role in delivering the new homes that the country is desperately in need of.	Not every site needs to be allocated. Small sites do not need an allocation policy as there is unlikely to be anything site-specific it would need to cover. However, small sites are not in any way prevented from coming forward, and they are factored into the assumed capacity of the city through application of a windfall forecast.
S1 Spatial strategy	Oxford unmet housing need	The policy outlines how Oxford's development needs will be met but doesn't address the role of neighbouring local authorities in	Policy H1 outlines the housing requirement and unmet housing

Draft Policy	Topic	Summary	Response
		this process. Since Oxford's city boundaries have limited capacity, a significant part of its future housing and employment demands must be met in adjoining areas. The existing plan acknowledges this but relies on a regional strategy that has not progressed. Therefore, a new, agreed-upon approach is needed to address Oxford's unmet housing needs collaboratively. The plan should be bold enough to state that if growth ambitions are to be met in full, cross boundary joint working will be necessary with neighbouring authorities to consider how additional unmet needs can be met.	need is referred to. A formal request has been made of our neighbouring authorities for helping meeting unmet need, and duty to cooperate engagement is ongoing.
S1	SA of spatial strategy	Hallam is concerned that the Spatial Strategy has not been presented as a preferred option alongside any alternatives in the consultation. We can only look to the Sustainability Appraisal in this regard and the growth strategy for the Local Plan where six alternatives have been presented upon which the preferred option is based - a balance between providing for housing and employment land needs whilst delivering on wider local plan objectives. The Spatial Strategy must also be able to express more spatially where growth can be focussed. To some degree the plan sets out Areas of Focus and this could be reflected in the Spatial Strategy.	The SA and six alternatives for the growth strategy show that various options were considered.
S1	Proposed amendment	Minor change proposed to better reflect the duty on decision makers set out under S38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) to have regard to the Development Plan as a whole... Proposed amendment: <i>"Planning permission will be granted where development proposals accord with the policies of the Plan <u>taken as a whole</u>."</i>	Amendment made.

Draft Policy	Topic	Summary	Response
S1	Proposed amendment/ modification	Move all text contained within Policy S1 to the supporting text. Policy is ineffective as it is mostly aspirational. It allows any development anywhere providing it meets the criteria. It not a policy but a fluffy wish-list. ALL development will generally be a net negative for resident amenity even if it has positives such a housing provision.	Providing criteria to achieve is not considered to be merely aspirational.
S1	Comment – proposed amendment	This new policy should set out a Spatial Strategy for meeting the vision and objectives of the Plan referring to the need to maximise housing delivery in Oxford. The Spatial Strategy should also set out how the proposed development is to be delivered over the plan period and beyond. The Spatial Strategy should follow the approach in the extant Local Plan (i.e. maximising growth in the City and then adopt a hub and spokes approach, with the City being the focus for education, tourism and employment but having good infrastructure links into the surrounding Districts where housing is more readily deliverable). The wording of the Spatial Strategy should fulfil the role of the LP42 and respond to challenges which include “national and international pressures such as rising build costs for new development, a chronic undersupply of housing, climate change and energy insecurity”. And to “build upon the positive aspects that make the city so special, whilst also seeking to address the challenges we face through positive planning policies to ensure the optimum outcomes for the environment and its residents, businesses, education, and health institutions”. In terms of addressing the undersupply of housing, the wording of the new Spatial Strategy should be similar to the adopted Local Plan 2036 which acknowledged that “addressing the housing issue is a key priority...”. The locational text in Chapter 8 of LP42 which is more	The spatial strategy does refer to sustainable locations. The described spatial strategy with spokes into the districts sounds like work that was done as part of the Oxfordshire Plan, which was never completed. It is beyond the scope of the Oxford Local Plan.

Draft Policy	Topic	Summary	Response
		akin to a spatial strategy should also be reflected in the Spatial Strategy, to focus delivery in sustainable locations. The Spatial Strategy should also respond to the importance of Oxford's location, "Oxford is also highly sustainable location for employment in Oxfordshire and the southeast. Enhancements could be made to the already sustainable transport system to take people to jobs here rather than if employment is scattered to less sustainable locations. A concentration of employment in a sustainable location is better than dispersed employment relying on the private car. In particular, the city's economy is shaped by the presence of its two successful universities". Without a clear spatial strategy the LP42 is unsound as it is not positively prepared, effective or justified.	
S1&S2		Cyclox support these policies	Support noted.

Statutory Consultee Responses – Draft Policy S1

Oxford County Council

Topic	Summary of comments	Response
Policy S1 needs to be sufficiently flexible to ensure appropriate developments, e.g., demolishing old buildings and replacing them with new housing, can be found to be compliant with policy, providing there is clear environmental justification as to why their reuse is not feasible/viable.	Policy S1 provides the plan's over-arching strategy. Other policies specifically deal with the reuse of buildings.	No action required. Resolved.
Oxfordshire County Council seeks that the effects of development are mitigated through appropriate conditions, works and contributions to infrastructure.	Noted.	No action required. Resolved.

Topic	Summary of comments	Response
We expect to agree S106 contributions and S278 works in respect of development envisaged in this Local Plan, as well as agreeing the use of Community Infrastructure Levy (CIL) receipts for some infrastructure needs.	Policy S3 sets out more information about S106, S278 and CIL.	No action required. Resolved.

All Public Responses – Draft Policy S2

Draft Policy	Topic	Summary	Outcome
S2	Clarification	We support the reference to the “..wider townscape and landscape” within this policy. We feel that the supporting text could include more detailed information on what this means, and could also include specific reference to the wider green setting of the city. It is also pleasing to see that the supporting guidance in Appendix 1.1 highlights the issue of important views across the city and how these can be both views from the outskirts in towards the historic centre, and those that are from the centre looking out towards the green hills which surround the city.	Support is welcomed. That part of the policy wording will be amended for clarity.
S2	Policy should mention high quality architecture	While we support the general aims of the policy, it does not mention any preference for high quality architecture within the city centre. In a city filled with rich examples of internationally significant architecture, we would like to see the council’s stance in favour of supporting examples of high quality architecture within the city centre set out clearly in policy.	This is a strategic policy that addresses specifically the approach in the plan towards design guidance. The plan includes a policy that addresses high quality design (policy HD7), and other policies that affect placemaking such as green spaces (G1, G2, G3), historic environments (HD1, HD2).
S2	Weighting of local design	Draft Policy S2 (Design Code and Guidance) makes reference to development proposals referring to and aligning with the design principles set out in the Botley Road Retail Park Development Brief	Any design guidance will be produced to be in accordance with the policies of the plan. As

Draft Policy	Topic	Summary	Outcome
	codes and design briefs	2022. On adoption, the policies contained within the new Local Plan will carry greater weight in decision making on account of the Local Plan being more up to date than the Development Brief and the nature of the Development Brief being guidance only. This policy weighting should be acknowledged within draft Policy S2 for the avoidance of doubt.	they are not statutory documents they can be amended or updated as technical documents to be in line with the extant local plan policies. Their weighting will be set out in the policy supporting text.
S2	Strengthen design checklist	we consider that this policy and the design checklist at appendix 1.1 could be strengthened. A common complaint across communities is the banality of much new housing development, dissatisfaction with design quality, and frustration with design that is not in keeping with the existing built environment. It is our experience that communities wish to positively influence the design of new housing, ensure that heritage considerations are thoughtfully and pragmatically balanced with quality contemporary design, and achieve design that responds positively to the local context. These straightforward but positively impactful aspirations could be strengthened in Local Plan policy. Larger developments should include a requirement to establish a forum comprised of local organisations/ residents who can have proper input into the design of new developments on an equal footing with other statutory consultees. Such an approach has been shown to lead to developments being more integrated into the current local community and lead to better social and health outcomes for the new residents.	Developers are encouraged to engage with planning officers at the earliest possible stage so that any concerns are identified at the earliest opportunity, and engagement with the local community is also good practice particularly for major schemes. There is a basis for this in national policy and is set out in the City Council's Statement of Community Involvement.

Draft Policy	Topic	Summary	Outcome
S2	Local Heritage Assets	The following policy is muddled as statutory duties are as below anyway, and implies English Heritage listed assets will not be protected. Final paragraph of the policy states: <i>In recognition of the significance of Oxford's heritage, and as part of its positive approach to the historic environment, in addition to fulfilling its statutory duties, the Council will:</i> <i>a) identify, conserve and enhance local heritage assets</i>	This refers to heritage assets on the local list, which do not have statutory designation.
	Design Guidance	Design guidance is not a material consideration unless backed up with an Article 4 restriction.	An Article 4 direction are not required for local design guidance to be a material consideration.
	'Positive strategy'	Bullet point d) of the final paragraph makes reference to a 'positive strategy' in the context of heritage assets at risk. The respondent asks "what is a positive strategy? It is simply waffle.	This refers to an approach of proactive engagement with landowners to support and encourage them to explore options for safeguarding the future of heritage assets at risk.
	Modifications	- Whole policy needs to be moved to supporting text. - The word <i>should</i>, needs to be replaced with <i>must</i>, for the policy to be effective.	Where relevant developers will also be encouraged to consider how their schemes may enhance the setting of such heritage assets or directly contribute to the safeguarding of their future.

Draft Policy	Topic	Summary	Outcome
S2	Support + clarification sought	The inclusion of a Design Checklist at Appendix 1.1 is supported. The reference in the Appendix to the Design Code document should be clarified in terms of whether reference is being made to the National Model Design Code.	Comment noted.

Statutory Consultee Responses – Draft Policy S2

Historic England

Draft Policy	Summary	Response	Outcome
S2	Current title does not reflect the content of the policy. Suggest review, and also consider what a strategic policy on the historic environment should contain and whether policy content needs further update. One topic that could usefully be integrated is promoting opportunities for heritage-led regeneration. Hope the supporting text on heritage at risk from LP2040 Statement of Common Ground (SoCG) can be integrated into the final supporting text.	We agree the title could be changed to be more reflective of the policy. We will also have a think about the additional point and are happy to discuss further through statement of common ground where necessary.	Policy title updated. Council will give further thought to other suggestion re: heritage-led regeneration

Oxfordshire County Council

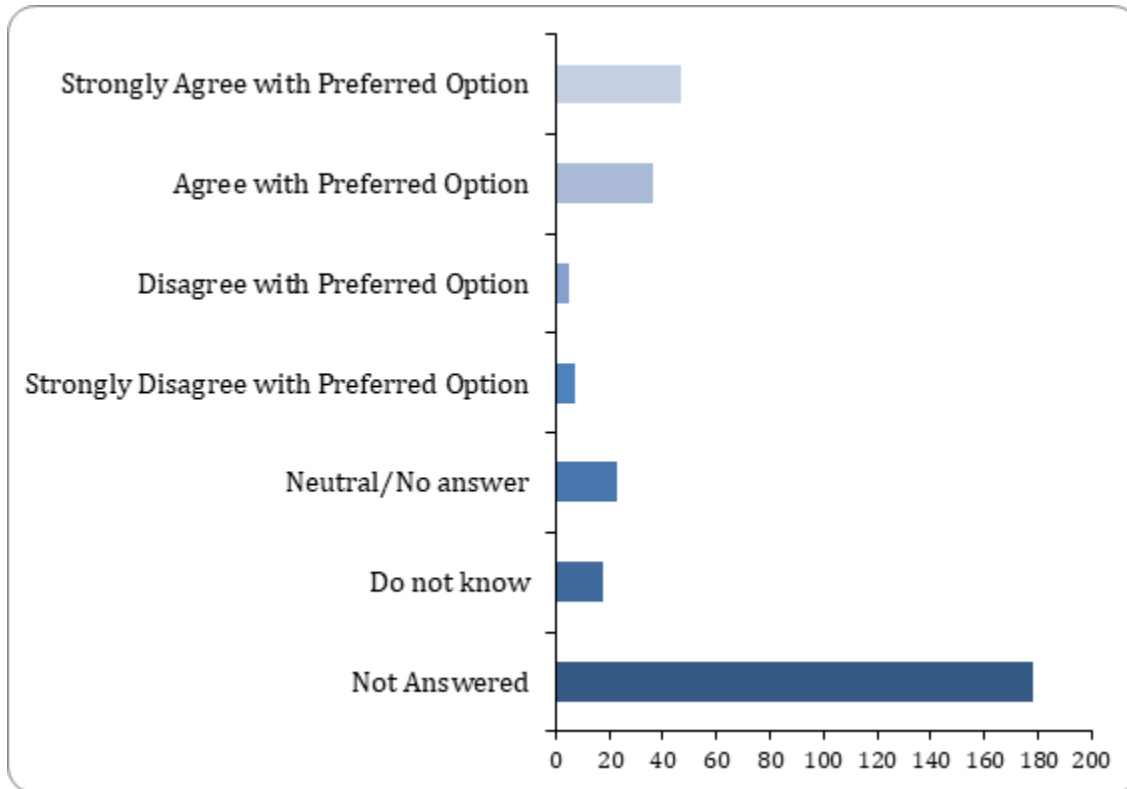
Topic	Summary of comments	Response
Landscape & Nature Recovery – Landscape		

Topic	Summary of comments	Response
Recommend that the policy and/ or design code includes reference to GI and the requirement to protect existing trees and hedgerows. Support design checklist at Appendix 1. It includes a lot of text making it not easy to use. Should consider if the checklist can be presented in more user-friendly way (e.g. more visualisation, interactive methods, etc.). It is not clear what applicants need to submit, or how compliance with the design code will be assessed. Innovation Supporting text for Policy S2 should reference the Innovation Framework (available online as part of LTCP. The Innovation Framework requires an Innovation Plan to be produced. This is a mechanism for developers to comprehensively consider the need for innovation and futureproofing in the pre-planning stages of major new developments. Urban Design (Placemaking) Require the inclusion of a reference “to carry out work with other local authorities and districts (where applicable) on producing and promoting use of other guidance – e.g., Oxfordshire Street Design Code (currently under development).	Design Checklist sections N1-N4 cover GI. Existing trees/ hedgerows are protected via other policies in the plan. Policy HD7 sets out that the design checklist could be included with a Design and Access Statement submitted alongside a planning application. No change proposed. Having reviewed the Innovation Framework, it seems to apply more to infrastructure projects and is already supporting strategy for the LTCP. The Local Plan includes policy requirements to guide development in the city. As such, the inclusion of such a reference in the plan is not appropriate. We will continue to work with county colleagues to develop any relevant guidance.	No action required. No action required. No action required. No action required.

All Public Responses – Draft Policy S3

Please tell us what you think about policy options set 014a (draft Policy S3): Infrastructure Delivery in New Development .

There were 136 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	47	14.97%
Agree with Preferred Option	36	11.46%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	23	7.32%
Do not know	18	5.73%
Not Answered	178	56.69%

Draft Policy	Topic	Summary	Response
S3	Strengthen social infrastructure element of policy	Community First considers that the themes of social infrastructure and community development could be significantly strengthened. To help achieve thriving, sustainable communities it is vital to set out expectations and enable locally-specific strategies to support long-term, on the ground community development support to support the process of new community formation, extend and deepen social and community infrastructure, and build bridges between existing and new residents. DRAFT POLICY S3: INFRASTRUCTURE DELIVERY IN NEW DEVELOPMENT sets out a range of expectations with regard to the provision of physical infrastructure. This policy would be strengthened by including an additional paragraph which considers social infrastructure, for example: <i>Where appropriate, in relation to the type, size, and scale of a development proposal, developers will be expected to engage early with the Council in order to identify and make to make sufficient provision to support site specific community development activity.</i>	This is an over-arching infrastructure policy which is supported by the Infrastructure Delivery Plan (IDP). While certain key physical infrastructure projects are referenced in the policy, the policy itself applies to all infrastructure – physical, social, green, etc. The IDP includes a schedule of projects to support planned growth over the plan period. Social infrastructure projects are included within the IDP. There is no need to explicitly reference social infrastructure in this policy as it is covered under the umbrella term of infrastructure.
S3	A more flexible approach suggested.	The infrastructure needs and delivery of an industrial site will differ from residential or mixed-use developments. A more flexible approach that allows for phased delivery would be welcomed.	Paragraph 3 of Policy S3 already includes some wording to ensure that infrastructure improvements are delivered “at a rate and scale to meet the needs that arise from that development or a phase of that development”

Draft Policy	Topic	Summary	Response
S3	More engagement with all stakeholders	Developers should engage with local active travel stakeholders (e.g. Coalition for Healthy Streets and Active Travel, Oxford Pedestrian Association). Oxford railway station should become a central transport hub, incorporating a nearby bus and coach station. Beckett Street car park is the preferred location for this hub due to its proximity and ownership. Urgent consideration needed before finalising housing/employment plans. Relocating the bus station from George Street is key to enabling a high-quality east-west cycle route through the city centre.	See response in box below See response in box below See response in box below Noted Noted
S3	Support for policy, with suggested amendments	Add: Engage with transport stakeholders to understand network opportunities pre-masterplan, to get the best results and avoid potential problems such as cutting off existing or future active travel routes. We specifically suggest that CoHSAT is engaged in any Major Development to identify opportunities or challenges. Change ‘rail and bus’ to ‘rail, bus, active travel and links between these networks’.	The policy itself does not make reference to specific stakeholders as it is intended as an over-arching holistic policy which guides applicants to engage with appropriate/ relevant stakeholders. While active travel measures are supported through the IDP, these are usually delivered through developer contributions (e.g., S106/ S278 agreements. Whereas the policy states “Proposals to enhance the city’s rail and bus network will be supported” relates to a much

Draft Policy	Topic	Summary	Response
		The transformation of Oxford railway station should include a new fit-for purpose bus and coach station located close to the railway station, and a site should be allocated for this in the current Beckett Street car park.	broader suite of infrastructure, some which may require planning permission. The policy requirements for Oxford Railway Station/ Becket St car park will be set out in bespoke site allocation policy and any wider infrastructure requirements included within an Area of Focus Policy for the West End/ Botley Road. Neither of these policies include reference to a new bus/coach station. No changes are proposed.
S3	Infrastructure led regeneration	Network Rail welcome the preferred option for Policy S3 which outlines support for proposals that can enhance the city's rail and bus network, including Cowley Branch Line and Oxford Railway Station. However, redevelopment of Oxford Station is expected to act as a catalyst for economic regeneration, attracting investment and supporting new employment in and around the station area. The Local Plan should recognise the strategic importance of infrastructure-led regeneration in supporting the local economy.	Support noted. We can consider whether to incorporate these issues within Area of Focus/ Site allocation policies.
S3	CBL Buffer Zone	The inclusion of text relating to the proposed CBL buffer zone is not enforceable. It does not wholly and exclusively relate to the development and would not be justified, (especially for householder applications). BMW for example (at the end of the	The CBL buffer zone area is the area where financial contributions from <i>new</i> trip generating development will be <i>expected</i>. (<i>emphasis added</i>).

Draft Policy	Topic	Summary	Response
	Modification/ amendment	line) may benefit but so might others who use it as a transit point to go to Oxford Central. Remove the following text: <i>Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL [Cowley Branch Line] stations will be expected</i>” Unless there is a clear relationship between the proposed development. Contributions to CIL should be provided by city-wide CIL	Developer contributions are not sought from householder applications. CIL applies to minor and major developments in Oxford, while any financial contributions collected through this policy would be through the S106 process. The City Council already as a CIL charging authority already has a CIL tariff in place. The text also includes reference to the paragraph in the NPPF that sets out the tests for developer contributions (para 58 NPPF, Dec 2024). No changes are proposed.
S3	Infrastructure Delivery Plan	A clear, up-front rule that links schemes to an up-to-date Infrastructure Delivery Plan is preferable to ad-hoc negotiations: it gives landowners price certainty, speeds decisions and ensures that roads, bus priority, fibre and drainage scale in step with new homes and labs. The key, however, is to keep the IDP lean and regularly refreshed—no sprawling wish-list that becomes an open-ended tax. Contributions should default to a transparent, per-unit CIL/Section 106 tariff, with viability testing only for genuinely abnormal sites, and there must be scope to swap listed projects if evidence shows a higher-yield use of funds (e.g. bus lanes	The IDP is a ‘live’ document and is usually updated on an annual basis. Preferred Option Selected for reasons set out in Background Paper

Draft Policy	Topic	Summary	Response
		outranking public-art budgets). In short, the policy should secure essential enabling infrastructure without piling unpredictable, scheme-killing costs onto the very development Oxford needs to stay dynamic and affordable.	
S3	Timing of Infrastructure delivery	An emphasis on appropriate timing of infrastructure requirements would be useful- i.e., do not leave it till the end of the project.	Policy S3 recognises the importance of delivering infrastructure in a timely manner.
S3		I feel it is essential that new developments contribute to local infrastructure, but it would be good to see details of how this would be drawn up and enforced.	The IDP sets out the infrastructure required to support the delivery of the local plan. Policy S3 and the IDP provide the basis for developer contributions. Infrastructure is delivered through legal agreements/ conditions which are enforceable.
S3	Do not include policy	Four respondents considered that no policy on infrastructure delivery was required.	Preferred Option Selected for reasons set out in Background Paper
S3	Use evidence to support infrastructure delivery	It is important that the Council uses its evidence base (including the updated Playing Pitch Strategy) for sport and provides contributions to new sports facilities within the city.	The IDP sets out the infrastructure required to support the delivery of the local plan.
S3	Co-ordinated delivery of active travel routes	Prioritise a public health with a programme to join up and upgrade walking and cycling route into completed networks. Such a programme will pay for itself in health and productivity.	The IDP sets out the infrastructure required to support the delivery of the local plan.

Draft Policy	Topic	Summary	Response
S3	Shared service duct requirements for new development	With new developments, will services be required to be in shared service ducts and thus provide more space for trees especially street trees?	There is no requirement for services to share service ducts. Preferred Option Selected for reasons set out in Background Paper
S3	General comment	No idea what the text above is talking about.	Preferred Option Selected for reasons set out in Background Paper
S3	General comment	Additional infrastructure is needed for new people and developments.	Preferred Option Selected for reasons set out in Background Paper
S3	General comment	This should already be in place	Policy S3 recognises the importance of delivering infrastructure in a timely manner.
S3	Support	Support the policy subject to delivery on an appropriately phased timescale which will be development specific.	Support noted.
S3	Support	Support Preferred option which will ensure that development is more closely linked to infrastructure planning and should therefore encourage sustainable decision-making.	Support noted.
S3	Support	Having a policy seems a good thing to have.	Support noted.
S3 and S4	Support policies	Policy S3 and S4 are critical policies to ensure that policies contained within the Plan are deliverable and underpinned by sound evidence. Support inclusion of draft policy S4.	Support noted.

Statutory Consultee Responses – Draft Policy S3

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy	Summary	Response	Outcome
Draft Policy S3	Justification for the CBL 1,500m buffer for contributions is needed and confirmation of viability. S3 not fully deliverable as it extends beyond the city boundary. Not within 10mins walk.	Contributions have been viability tested. Policy S3 only applies to sites within city administrative boundary.	No further action.

National Highways

Draft Policy	Topic	Summary of comments	Response
S3	The Local Plan should provide a policy framework to ensure development cannot progress without the appropriate infrastructure being in place. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel, particularly on the SRN. Infrastructure improvements on the SRN should only be considered as a last resort.	Draft Policy S3 – Infrastructure Delivering in New Development advocates this approach. Infrastructure schemes covered in the IDP are included following discussions with key stakeholders.	At the meeting, the City Council and National Highways agreed that the issues raised within National Highways response to the Reg. 18 Plan consultation had been satisfactorily resolved.

Oxfordshire County Council

Draft Policy	Topic	Summary of comments	Response
S3	Strategic Planning Support the inclusion of strategic infrastructure projects (e.g., Oxford Station and Cowley Branch Line). Draft Policy S3 provides a defined buffer zone within which financial contributions will be sought. The County Council would prefer the policy to set out a more flexible approach. On this basis, the County is keen to continue working with the City on identifying suitable wording for this section of the policy between the Reg 18 and Reg 19 stages of the plan preparation. Place Planning and TDM (Central) Specific reference should be made to the city's Park & Ride (P&R) network alongside rail and bus. Emerging work to update the Oxford Park & Ride strategy suggests a need to provide more capacity serving the city within the plan period. This is linked to employment growth in the city, including redevelopment and intensification of existing and future employment sites as well as policy for more low car development. The County Council's core schemes (trial traffic filters, ZEZ expansion and workplace parking levy) will also increase demand for P&R.	Noted. Increasing the flexibility of the approach also reduces the certainty of receiving contributions as each development needs to be determined on a case-by-case basis. We will continue working with county colleagues as the plan production process moves forward. We cannot include infrastructure requirements based on unpublished or emerging work. If the P&R strategy is published in a timely manner, then we can consider updating the IDP	No action required. Worked with the County Council to agree an amendment to Policy S3 to address this issue. Oxford City Action: Keep a "watching brief" for publication of emerging studies/ strategies

Draft Policy	Topic	Summary of comments	Response
	Emerging work also identifies the need for more consistent and higher quality facilities at existing P&R sites and improved interchange with other modes. Further bus service enhancements are also required to ensure all areas of the city are adequately served by P&R, again, particularly the south-east of the city. Innovation Hub New infrastructure should be futureproofed and consider how needs will change over time as both society and technology changes, including the need to mitigate and adapt to climate change. It is important that the Local Plan sets out the need for new infrastructure and infrastructure improvements to consider these changes (e.g. changing grid demands with electrification of vehicles and heat, vehicle automation, greater digital connectivity, 5G/6G etc). Environment and Circular Economy The Household Waste Recycling Centre (HWRC) at Redbridge is a critical facility for householders to deliver their waste for reuse, recycling and composting for Oxford residents and beyond. It is anticipated that a HWRC in this location will continue for the foreseeable future.	with any identified P&R schemes that affect the city. See above. When the strategy is published and schemes/ infrastructure projects are identified we can consider their inclusion in the IDP. Draft Policy S3 already includes a reference to “futureproofing” infrastructure. The requirements of the policy are to ensure that new development mitigates any impact by supporting	Oxford City Action: Keep a “watching brief” for publication of emerging studies/ strategies

Draft Policy	Topic	Summary of comments	Response
		infrastructure delivery. It would be for 3rd party infrastructure providers to deliver (and futureproof) any required infrastructure. Thank you for the update. No changes proposed.	

BOB ICB

Draft Policy	Summary	Response	Outcome
Policy S3	The ICB supports Policy S3 and welcomes the proposed engagement with developers to discuss the requirement of the infrastructure. The NHS body which is responsible for the commissioning neighbourhood health services or primary care services should be engaged in any pre-application engagements such as preapplication and planning performance	Noted. Noted.	No further action

Draft Policy	Summary	Response	Outcome
	agreement (PPA), including the delivery of neighbourhood health centres and other primary care health facilities in the city. The pre-application engagement will allow the ICB or as such appropriate body which is responsible for the commissioning neighbourhood health services or primary care services and the relevant PCNs to have further discussions with the Council and potential developers about the appropriate primary care mitigations as part of the wider housing developments. The ICB proposed the following wordings to the Draft Policy S3: “Development proposals to deliver a neighbourhood health centre and new primary care health facilities or improvement works to existing primary care health facilities will be	Noted.	

Draft Policy	Summary	Response	Outcome
	supported subject to the proposal complies with other policies set out in the Document. Developers must engage with the relevant neighbourhood provider, the Integrated Care Board or as such appropriate body which is responsible for the commissioning neighbourhood health services or primary care services to agree with the delivery and funding arrangement of the neighbourhood health centre or the primary care health facility.”	Policy S3 is an overarching infrastructure policy which sets out that planning contributions will be sought from development to deliver required infrastructure to mitigate identified impacts from development. Draft Policy S3 sets out that “the standards of infrastructure delivery will be expected to comply with other policies set out in this Plan.” Draft Policy S3 already includes an expectation for developers to engage with infrastructure service providers to discuss their requirements.	

Draft Policy	Summary	Response	Outcome
		Including bespoke healthcare requirements are not therefore required because the policy already sets out over-arching expectations relating to engagement and ensuring that infrastructure complies with the other policies in the Plan.	

All Public Responses – Draft Policy S4

Draft Policy	Topic	Summary	Outcome
S4 Viability	Undertaking assessments to support applications	Any assessment of viability regarding affordable housing must be undertaken by a suitably qualified independent viability consultant and that consultant must be agreed by the applicant in advance of any appointment.	Amendment made to policy to clarify this.
S4	Viability Evidence / study	Further work is required to ensure the Plan's assumption (that all planning applications that comply with policies should generally be assumed to be viable) is indeed the case. Testing in respect of older persons housing requires some clarification in terms of the assumptions made and we would encourage the council to engage with providers of such typologies at an early stage.	The Viability assessment of the plan has tested a wide range of development typologies to represent the types of sites that are likely to be developed in Oxford during the plan period. The contributions and

Draft Policy	Topic	Summary	Outcome
			requirements set out in policies are set at a level that the majority of qualifying applications would be able to deliver viably. This includes C2 forms of residential development, which can include communal older persons accommodation, and C3 which would include self-contained older persons accommodation.
S4	Viability Evidence / study	The Council's website does not include any evidence studies relating to Viability. This is a notable omission given that the wording of draft Policy S4 states that "the policies in the Plan have been viability tested". Without the Viability Assessment, it is unclear whether draft policies have been subjected to a whole plan viability assessment, which will then define how easily or not the aspirations can be delivered. Such an assessment would also define the percentage of affordable housing and answer the question of whether a lower level of affordable housing should be considered in order to allow for the environmental improvements sought. It is difficult to comment on individual policies and wider implications (including in relation to future site allocations) without understanding how they impact on the need for housing and employment land and indeed viability overall. Viability evidence to support the plan not published as part of the Reg. 18 consultation. Without viability evidence, the cumulative cost impact of policy requirements (including increased CIL Rates,	The Viability assessment is an iterative process, to test emerging draft policies, inform refinements to policies, and test final policies. At the Regulation 18 consultation the assessment was not published because it was incomplete. Policies requirements are assessed individually and cumulatively as a whole plan, in order to test the full range of policy requirements which an application might be required to deliver.

Draft Policy	Topic	Summary	Outcome
		S106 etc.), cannot be properly assessed. Viability evidence also needs to consider emerging WPL etc.	
S4	Viability Evidence / study	Given the number of emerging policies affecting R&D-led development, the viability evidence must use realistic inputs and test appropriate site typologies, including lab-enabled buildings with high servicing and sustainability requirements. Concerned that a generic, one-size-fits-all viability approach has been taken, which fails to reflect the distinctive operational, ownership and financial realities of specialist sectors such as life sciences. Macro-economic events and interest rate rises can have a significant and long-lasting impact on the property market. It is important that the viability of the development plan is therefore resilient, and that the viability work supports this.	The Viability assessment of the plan has tested a wide range of development typologies to represent the types of sites that are likely to be developed in Oxford during the plan period. The contributions and requirements set out in policies are set at a level that the majority of qualifying applications would be able to deliver viably.
S4	Impact of policy requirements on viability (particularly employment uses)	The Local Plan should not put in place policies that fetter development opportunities from being brought forward or that mean those tasked with major development investment decisions must operate at the margins of viability. Concerned about the cumulative impact of the cost of the proposed policies in the plan (particularly in relation to employment uses), which are in addition to the recent amendment to the CIL Charging Schedule. Those increased costs will ultimately be reflected in rents charged to occupiers. Rising occupier rents on top of tax rises including National Insurance and Business Rates, will reduce the funding available	The policies in the plan have been assessed in the viability modelling to help inform the level of contributions are set at an appropriate rate so as not to fetter development. This is in accordance with the NPPF which requires local plans to be deliverable, meaning that obligations and policy burdens should not make development unviable. The testing has taken into account the recently

Draft Policy	Topic	Summary	Outcome
		for their research and development activities and risks driving many away from Oxford to more competitive locations both within the UK and abroad. That would have a profound and potentially irreversible impact on Oxford's position as a leading centre for innovation. We request that the cost of proposed policy changes, are assessed and considered as part of any transparent decision-making process as part of the Plan progresses. Serious concerns about the viability and deliverability of development within the Local Plan. Paragraph 86(c) of the NPPF is clear that planning policies should facilitate modern economic development, including science and innovation. Introducing further financial burdens (on top of already high land values and infrastructure costs) risks deterring occupiers and investors. Concerned that additional planning costs will mean that key employment sites become undeliverable.	updated CIL rates for employment as well. In the event that it is not viable for a proposal to deliver the full policy contributions, then the Plan also builds in flexibility via the cascade policy in S4, so that proposals can be adjusted until they become viable.
S4	Viability cascade for Residential development	We note that this Policy recognises that imposing the 'low car requirement' in the parking policy (Policy C8) will be very unpopular with residents, will therefore reduce the selling price of properties, and will contribute to difficulty in achieving viability of developments needing other requirements such as having 40% affordable homes.	The viability assessment has tested the impact of Policy C8 and found that the majority of typologies can deliver this requirement along with other policy requirements. Furthermore a lot of proposals would be in locations where C8 policy did not apply.
S4	Viability cascade for Residential development	The overall goal must be to increase the number of houses, it is extraordinary that to maintain viability, car provision, and consequent loss of space for housing, is increased first and then affordable housing provision. It is clearly better to have 10 homes	Viability testing builds in an assumption for developer profit in accordance with the NPPF guidance for a developer profit margin of 15% to 20% of the

Draft Policy	Topic	Summary	Outcome
		with two affordable, than 6 houses, 3 affordable, with space wasted for parking and car infrastructure. This is ineffective as there is no definition of viability, which would be considerably more than breakeven for a developer to proceed with the development.	Gross Development Value (GDV). Agreed that the number of homes is important but so is the affordability of homes, in the context of the affordability crisis in Oxford specifically.
S4	Viability - development costs	The science and innovation sector, like the wider UK development industry, is navigating significant challenges: rising construction costs, global competition, constrained funding conditions, and increasing regulatory obligations.	The viability assessment to inform the plan, takes into account recent, current and forecast future market trends.

Statutory Consultee Responses – Draft Policy S4

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome
S4	Strategic Planning Do not support the viability cascade as it is not in line with the county's policies on low carbon or the LTCP objective to reduce car trips. The County Council would like to see developers encouraged to make the best use of land, creating sustainable buildings at	See below for rationale for inclusion of the viability cascade. Other policies in the plan already cover these specific issues. Policy C8 sets out motor vehicle parking design standards. For residential development, this includes setting criteria for low car schemes (0.2 spaces per 20 dwellings) and maximum parking standards that reflect the County Council's residential parking standards for Oxford city. For non-residential parking	This response was sent to the County Council for review. Following a review and further discussions between City and County officers, no further

Draft Policy	Summary	Response	Outcome
	good densities and not using land wastefully on car parking. Draft Policy S4 should be amended to remove a hierarchy that allows the removal/ minimisation of net zero buildings and that allows an increase of car parking contrary to the County Council standards to not be met before there is any consideration of reducing the affordable housing requirement. Instead, all the possible allowances to provide for viability should be considered in the round	developments, the starting point is no additional parking (except for blue badge/ servicing) and a reduction in spaces will be sought at highly accessible sites. Any additional car parking at non-residential developments should be kept to a minimum, with the need being demonstrated through submitted TA. Policy HD8: Making Efficient Use of Land sets out the expected densities for development (i.e., 100dph for the city/ district centres/ 80dph for gateway sites/ 60dph in most other locations. Policies R1-R3 provide the plan's requirements for delivering sustainable buildings. Policy R1 provides that offsetting may be accepted, as a last resort, to offset remaining energy demand that cannot be sourced on-renewably on- or off-site. The policy sets out that the City Council will accept payment into the Council's offsetting fund for this remaining energy demand (secured through an appropriate legal agreement/ S106). Policy C8 and Appendix 7.6 set include vehicle parking standards (both "low car", and the aligned city/ county residential parking standards for Oxford). The viability cascade does not suggest that parking standards would be allowed that was contrary to city/	specific action was identified.

Draft Policy	Summary	Response	Outcome
	Place Planning & TDM (Central) This section of the Preferred Options document comes across as overly permissive. What the ‘particular circumstances’ are and what the relaxed standards would look like would be important. Such instances should be exceptions rather than the rule and any relaxation of standards should be kept to a minimum. In cases where there is no affordable housing requirement, we doubt that there is a need for any relaxation of standards. If allocating car parking spaces to units is considered necessary to make a development viable, a transport assessment may be required to demonstrate this is acceptable however we are concerned that any such policy contained in the Local Plan will	county (Oxford) standards but rather that these are effectively the “fall-back” position. National Policy (paragraph 35, NPPF) sets out the plan should set out the contributions expected from development and that such policies should not undermine the deliverability of the plan. Policy S4 provides a viability cascade which sets out the City Council’s approach “if the applicant can demonstrate the development to be unviable”. While the viability assessment for the plan provides the technical evidence to demonstrate that the policies in the plan (as a whole) should not undermine the deliverability of development, there are ‘particular circumstances’ (as set out in Paragraph 007 reference ID 10-007-20190509 of the PPG.	

Draft Policy	Summary	Response	Outcome
	encourage developers to claim that car-free or low car parking requirements affects their viability and that would put the County Council's policies at risk. Innovation Hub Before any standards were to be relaxed, consideration of whether the developer has taken innovative solutions into account would be beneficial, i.e., relaxation of standards should be considered only after every alternative has been ruled out, especially in relation to sustainable development. Climate Action The County Council notes the preferred option could result in a key aspiration of the Local Plan, to reach net zero by 2040, to be lost if developments enter negotiations based on viability. This is concerning as the cost and emissions savings of implementing net zero standards at the build stage is significantly	Policy S4 sets out that it is the carbon offsetting payments that should be reduced incrementally until viability is achieved (rather than reducing the environmental quality of the development). The ordering in the cascade represents the city's priorities.	

Draft Policy	Summary	Response	Outcome
	lower than achieving later through retrofit, and this additional cost will likely fall onto the occupant.		

All Public Responses to the Plan Process Overall

Topic	Summary of comments	Response
Consultation process- early engagement survey	The early engagement survey had 228 responses from a city of 165,000 residents but inclusive early engagement is critical and should use methods to capture input from many more, and particularly communities who are most difficult to reach. The results from this survey are not mentioned in the PO consultation.	Although the 2042 plan is a new plan, it can build on a lot of the work of the 2040 plan, which itself was informed by extensive consultation. Focus of the early engagement was in setting the scene that there are a few areas where the context has changed, but a lot of existing work to build on. The success of a consultation can't be measured only by the number of responses. The first statutory consultation at Regulation 18 had a much wider reach and bigger response rate. Nevertheless, statutory requirements are exceeded by an early engagement taking place.

Topic	Summary of comments	Response
Consultation questions – Q2: short survey	Wording of Q2 (short questionnaire) is misleading. Taking Care of Our Environment of the Planning Oxford's future: first draft Local Plan 2042 states: <i>We think it is important that Oxford is a green biodiverse city... We are protecting our important green spaces and features.</i> Instead, draft policy only protects sites which already have legal protection i.e. SSSIs and SACs. There is no protection for local wildlife sites. Yet many people will have voted in favour of this draft policy, under the misapprehension that it does indeed 'protect ALL our green spaces and features', not just the ones which the Council is legally obliged to protect. The misleading nature of this question invalidates not only the responses given but also invalidates the whole survey.	The plan includes a hierarchy of protection for ecological sites as well as protecting "Core Green and Blue spaces" - Policy G1. Policy G6 protects locally designated sites and sets out strict criteria which must be met, including "satisfactory mitigation and compensation".
Consultation process	Concerns over the complexity of the surveys, arguing this will exclude many from responding and responses will therefore not be representative of Oxford. Suggest introducing 1) Short video explanations for people who struggle with reading	This feedback has been noted and will be looked into for the Regulation 19 consultation and further consultation events.

Topic	Summary of comments	Response
	2.) Sending consultation out in sections (instead of whole plan) with deadline to return 3) have more localised consultation 4) have direct links to different sections on the online survey 5) have the option to save and return to the online survey. Questions are ambiguous and leading. Why is it not possible to vote on the alternative options if you are consulting on them anyway? All consultation material should meet professional standards for qualitative surveys. Furthermore, the list of site allocations should have been provided alongside the short surveys (not just the online surveys).	
Preferred options weighting	No information is given on what grounds preferred options are proposed/favoured and how that takes account of the evidence (e.g. the GI study report concludes Oxford's green spaces should be preserved and enhanced and new created, but only a tiny 'core' of these spaces are protected).	The background papers do set out a number of options in nearly all cases, and explain why the draft policy options were preferred. The background papers also link back

Topic	Summary of comments	Response
		to evidence and other relevant information to inform decisions.
Consultation process	Many planning authorities have a separate consultation on proposed site allocations after the Regulation 18 consultation, and we think that this would have been much fairer, especially as the next stage of consultation is supposed to concentrate on the plan's soundness only. This consultation also seems premature in relation to some of the proposed new site allocations as they are described as being still under investigation. In addition, we have had difficulty responding as there are errors and inconsistencies in the mapping and text, and the background information is incomplete. In our local area the interactive policy map shows more site allocations than are shown on the site allocation map in the online survey questionnaires. This seems likely to confuse or even invalidate some consultation responses. For at least one site (Warneford Hospital) the site assessment information is also missing. Approach to consultation engenders dis-engagement from democratic process. Site at	The proposed sites were included in the Regulation 18 consultation with proposed uses, just without detailed policies, But often there are no detailed policies on any topic at Regulation 18 anyway. The Regulation 18 consultation ran into the school summer holidays, but was largely outside of them.

Topic	Summary of comments	Response
	Meadow Lane remains allocated despite 50 emails objecting to it. Timing of consultation inopportune – start of school holidays when many people in community organisations are on leave or have childcare responsibilities. Hinders community stakeholders being able to give a meaningful & genuine response. We would welcome further & deeper engagement with stakeholders/networks which represent communities in Oxford.	
Headington Neighbourhood Plan is a “material consideration”	The Headington Neighbourhood Plan, (valid until 2026) which went through multiple thorough consultations, generated lots of responses and was approved by the Council must be a Material Consideration. Yet its Green Spaces and Biodiversity policies have been completely ignored. They would be an excellent basis for the policies of the Draft Local Plan 2042. Relevant policies in the HNP are as follows; GSP1: CONSERVING AND ENHANCING PUBLIC ACCESS GREEN SPACE	The Local Plan does not seek to replicate existing policy already contained within the development plan for Oxford. The Local Plan provides an opportunity to set the local planning policy framework for the entire city. Where policies in the Headington Neighbourhood Plan remain up to date, these should be taken account of in the decision-making process.

Topic	Summary of comments	Response
	GSP2: PROVISION OF GREEN SPACE WITHIN DEVELOPMENTS GSP3: CONSERVING AND ENHANCING BIODIVERSITY	
Whole plan	My objections to the Local Plan are: 1. lack of transparency over the plan amounting to ‘residents should not be allowed to comment or even know what is planned’ 2. Where are the background papers for previous rounds of consultation feedback? 3. Why are Green Spaces not protected adequately – but seen as ‘development sites’ 4. The options on the consultation do not provide any evidence for the decision made 5. If there are background papers to support ‘preferred options’ – where are the background papers or the justification for these options, and where is the feedback from the alleged Early Engagement?	1. This engagement exercise was intended as a way of enabling residents to see what is planned and to comment. 2. The consultation report for the early public engagement survey was published ahead of the Regulation 18 consultation 3. The vast majority of green spaces are strongly protected 4. Attempts were made to explain why preferred options were put forward.

Topic	Summary of comments	Response
	6. the survey report identified cross cutting themes: the protection of green spaces, sustainable infrastructure(especially sewage and flooding risks), the importance of aligning development with community health and wellbeing – however there is NO INFORMATION on how feedback on critical issues has informed the Preferred Option 7. Where are the background papers to prefer one green space Development site over another? 8. Where is the list of sites allocated for development - vital for residents to know what development is planned for their area and to ensure a strategic overview and not a blinkered generic response- is not provided in the short surveys (printed flyer and short online survey). Only the long online survey, that is least accessible to the majority of residents, gives the list of development sites and asks for feedback on whether these should be allocated 9. Wording is misleading, failing to define commonly used terms such as	5. The options were shown in the published background papers. 6. The explanations for the preferred options do refer to background information where relevant. 7. The Green Infrastructure Background Paper explains the approach 8. The sites were listed within the main document, but were not listed in the short questionnaire because that would have made the questionnaire not short or as accessible or possible to deliver door to door- but the questionnaire explained where ot find the information.

Topic	Summary of comments	Response
	‘important green spaces’ and ‘affordable’ housing. In reality, the term ‘important’ green spaces is limited to ‘core’ green infrastructure with legal protection rather than spaces important to local communities, joined up biodiversity or climate adaptation; the term ‘affordable’ is unclear and undermined as unaffordable in the background documents with the introduction of a new term ‘truly affordable’ - a phrase that is not defined. The Draft Local Plan will worsen Oxford’s current problems because: • LP Preferred options 2042 consultation does not achieve a balance between the economic growth agenda and the societal and environmental needs of the city. • Policies promoting economic growth are prioritised and stated as requirements. • Policies around green infrastructure, heritage, place, culture and equality are worded as vague aspirations, merely ‘seeking to’ rather than requiring	9. Care will be taken to ensure important phrases are defined in the Glossary. The plan aims to balance competing needs and considerations. The policies follow standard wording. The majority of the green spaces are strongly protected. There has to be some flexibility to allow re-provision, but many green spaces are strongly protected in situ.

Topic	Summary of comments	Response
	- The majority of the City's green spaces have no genuine protection This consultation and plan should be rejected on the grounds that - it hides the criteria/evidence on which the plans are being made economic growth appears to be the driver of this Local Plan and not plans which enhance Oxford for residents and which protect the local environment - consultation with the public has not been in depth despite the claim on the City's website <i>'We can't get the Local Plan right without input from the community.'</i>	
Whole Plan	The entire plan is centred around the "ecocidal" model of growth economics. Wealth inequality is increasing. The earth cannot continue to sustain 8 billion humans (the global economy and population size need to shrink by about 75%). Without healthy eco-systems and a	Comment noted. The Plan does attempt to balance need.

Topic	Summary of comments	Response
	reliable climate we are going to be increasingly challenged to survive.	
Whole Plan	The plan seeks to introduce a raft of new requirements for development including building performance and ecology. While these are important matters for the local plan they need to be applied within the economic realities of development.	Comment noted- these measures are viability tested.
Policies Map	It is noted that the site is within one of the 'Areas of Greater Potential' identified within Figure 7 of the High Buildings TAN 2018 (area 5A – Cowley Residential Suburb). As described in the TAN, these areas are where proposals for new high buildings are more likely to be appropriate. The site is also within the 'Dynamic Area' 7 – Temple Cowley Centre. We request that these areas and heights are included on the Draft Policies Map, which is currently limited to certain layers. We would also request that the support for growth, regeneration and high buildings is clearly advocated and supported within the site allocation policy for Templars Square.	These areas are not considered appropriate for the policies map, and they provide background information but do not have a specifically applied policy approach.

Topic	Summary of comments	Response
Evidence base	We note that a number of Local Plan evidence base documents are not available at this Regulation 18 consultation stage. This includes an updated Housing and Economic Land Availability Assessment (HELAA). It is essential that these documents are published as soon as possible so that their contents can be used to inform the preparation of the draft Plan and for comments to be made upon them.	The full evidence base will be published at Regulation 19.
Plan Period	The proposed plan period is from 2022 to 2042, which reflects the 20-year plan period in the adopted Plan (2016-2036). There is an issue with the starting date for the period being 2022 given that it is 3 years before the submission of the plan and 4-5 years before its likely adoption date. In addition, whilst the 2042 end date would achieve the minimum 15 year plan period, this is based on the plan achieving the programme in the LDS with the emerging plan being adopted in 2027. Given that this allows no room for slippage, the Group proposes a later date for the end of the plan.	Since the Regulation 18 consultation, the Plan period has been adjusted to a 2025 start date, with a plan period now of 2025-2045. The LDS has been updated to reflect this.
Viability Evidence	The Group is concerned that the current consultation lacks detailed viability evidence to	The Viability assessment is an iterative process, to test emerging

Topic	Summary of comments	Response
	show the proposed policies are deliverable, particularly when combined with existing infrastructure costs like CIL. They stress that, according to planning guidance, viability evidence should be proportionate and part of an ongoing process. They request that such evidence be published for consultation to allow proper scrutiny of the potential impact on both commercial and residential development.	draft policies, inform refinements to policies, and test final policies. At the Regulation 18 consultation the assessment was not published because it was incomplete. Policies requirements are assessed individually and cumulatively as a whole plan, in order to test the full range of policy requirements which an application might be required to deliver.
Duty to cooperate	It is a serious and fundamental concern that whilst the Council have stated that the Plan will be based on a capacity led approach, that no Duty to Co-operate paper has been prepared to address the question of unmet needs. The Plan states only that “discussions will continue about the remaining unmet need to 2042.” (paragraph 2.3 of the Reg 18 Local Plan”). Given the Council’s approach in the local plan is capacity based, the issue of unmet needs (whatever the figure is – see below), needs to be addressed, given the acute need for housing in the City, and the	Duty to Cooperate work with neighbouring district councils is ongoing to address Oxford’s unmet housing need.

Topic	Summary of comments	Response
	importance of the provision of housing to economic growth not only in Oxford, but for the County of Oxfordshire and its contribution to the national economy in terms of significantly boosting the supply of housing.	
Duty to cooperate	To address the “acute housing pressures” in Oxford and the “urgent need for more housing”, the Council is encouraged to maximise the provision of housing within the City and then liaise with its neighbouring authorities and other organisations to account for any unmet housing need. This should be done on a regular basis to address the recommendations made by the LP40 Examination Inspectors.	Duty to Cooperate work with neighbouring district councils is ongoing to address Oxford’s unmet housing need.
Plan Period	The Council have set the plan period at 2022 – 2042. Using the Standard Method (SM) Oxford housing needs are 1,087 dwellings per annum, (this reflects the latest housing stock data). Over the proposed plan period, 2022 – 2042 this equates 21,740 dwellings, which on the basis of the Council’s supply will result in a considerable level of unmet housing need that must be accommodated elsewhere.	The plan period has been adjusted to 2025 – 2045. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.

Topic	Summary of comments	Response
	The Council have chosen the start date of 2022 which is over four years prior to submission of the Plan in April 2026. The base date should be 2025 since the SM takes account of past supply through the affordability uplift to determine housing needs. As set out in the NPPF and PPG local plans are meant to look forward a minimum of 15 years (para 22), past delivery is taken into account through the use of the standard method. The PPG Housing and Economic Needs Assessment Paragraph: 004 Reference ID: 2a-004-20241212 explains how the Standard Method is calculated using the existing dwellings stock for the area and “the most recent data published at the time should be used.” As set out in the PPG the Standard Method also requires the affordability adjustment to be based on the most recent data, in this case it is the median affordability ratio 2024 that was published in March 2025. This suggests that the starting point should be in the year to which the affordability ratio relates. Consequently, it follows that the plan period should commence in 2025/26.	

Topic	Summary of comments	Response
	There have been recent examples (West Berkshire Local Plan, Isle of Wight, and North Norfolk Local Plan) where the Inspectors examining local plans have required the plan period to be extended to reflect paragraph 22 of the NPPF and for the starting point of the plan to be brought forward a year to reflect national policy in respect of the assessment of housing needs. The plan period should therefore be 2025 – 2042, resulting in a housing need of $1,087 \times 17 = 18,479$ homes.	
Plan Period	The Plan period runs from 2022 to 2042. If the Plan is adopted by March 2027, the strategic policies in the Plan will have a maximum lifespan of 15 years. This is supported by ChCh. If there is any slippage or delay in the timetable then the LP42's lifespan will be less than 15 years and will need extending. Should that situation occur then the LP42's housing need will also need to be increased accordingly.	The plan period has been adjusted to 2025 – 2045 and the housing need recalculated to reflect this. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.
Structure of Local Plan Survey	Found the local plan survey difficult to understand due to complexity and time constraints; concerned that many residents will be excluded from the	As well as the long questionnaire, that necessarily covered all

Topic	Summary of comments	Response
	consultation. Urges clearer, more accessible communication to enable meaningful public input.	proposals, there was also a short questionnaire.
General Comments: Ineffective Language/ Objectives not set	A Plan should not be only aspirational but lay out concrete measures by which the stated objectives are to be realised, it is therefore ineffective where policies are fluffy. Phrases such as “<i>should have regard for...</i>”, “<i>take opportunities taken...</i>”, “<i>be informed by...</i>”, “<i>into consideration...</i>”, “<i>should</i>”, etc. are not effective as clear goals are not set, and at most belong in the supporting text. The Council seems to impose solutions to issues, enforcing specific solutions on development, therefore this is not positively prepared. Much of the content of policies should be in the supporting text. Frequently, “policies” consist of idle speculation, and vaguely articulated and formed ideas - these are marked as fluffy or waffle. Verbose site description is	Draft Policies will all be reviewed to ensure effective and appropriate policy wording.

Topic	Summary of comments	Response
	waffle if not backed up with concrete policies detailing what is and not acceptable given the characteristics. “Reduce” is either meaningless as the baseline is not given, or not related to the application so ultra vires, as the condition must relate to the application. Many policies seem to assume that, if a report is written, the planning result will obtain, without providing any metrics as to what the goals or thresholds are to allow consent.	
General Comment: Repetition between site/ area policies and general policies	Many site-specific policies repeat endlessly concerns that should be, or are, general policies such as car parking, flooding etc, this is ineffective as it can lead to confusion or lack of consistency and is frequently simply wrong eg: <i>Policies G1 and G3 require protection of existing green infrastructure features and enhancement of</i>	The Reg. 18 consultation document (June 2025) did not contain any site-specific or area-based policies. The inclusion of specific references within site allocation policies can be useful, particularly when signposting how development at a

Topic	Summary of comments	Response
	<i>greening on site through the urban greening factor. Policy G5 requires onsite biodiversity enhancement, and Policy G2 requires new Green Infrastructure features and enhancement of existing features. It is expected that those requirements will be met in the following ways. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI. (JR, Churchill, NOC)</i> Is not only needlessly repeated, but factually wrong – G6 and G7 are the relevant policies.	particular site or area can meet/ achieve wider policy aims.
Sites not up to date	A number of sites listed (e.g.: Marston Paddock) have already been developed but remain in the plan, these are ineffective as already developed.	We will review the list of sites to ensure that they are up-to-date for the next stage of consultation.
Plans Confused With Execution	The requirement to produce a plan (eg Traffic Assessment, SA etc) is confused with the actual goal, which is to achieve specific outcomes. A plan is not a goal, it is a means to a goal therefore these policies are ineffective.	Plans are underpinned by evidence, which inform their production. Certain policies include requirements for additional evidence to be submitted alongside planning applications. This is to assist the

Topic	Summary of comments	Response
		decision-maker in coming to an informed decision.
Policy Map	It is not clear which Policy Map is the authoritative version, all are peppered with errors and omissions and not consistent with each other, rendering the OLP2042 ineffective and unsound. Green Spaces demarcation, possibly due to the illogical and wrong Green Space Survey 2020, is fundamentally incorrect. See Green Spaces (G1-G9)	The current extant policy map is for the adopted Local Plan 2036. A draft Policies Map was produced and consulted on as part of the Reg. 18 consultation (June-Aug 2025).
National DM Policies	The Levelling Up and Regeneration Act 2023 sets out provisions to introduce National DM Policies (NDMPs). NDMPs will implement a suite of national policy provisions for decision making with a view to streamlining Local Plans, enabling plan-makers to focus on matters that are genuinely local whilst also supporting consistent local decisions. Consultation on NDMPs is expected later in 2025 (prior to adoption/ possibly submission of Oxford's emerging Local Plan. Once adopted, Local Plans must not contradict or duplicate NDMPs – as per	Comment noted.

Topic	Summary of comments	Response
	Section 15C(7)(b) of the Planning and Compulsory Purchase Act 2004. ARC recommends the Council closely monitors NDMP developments and considers their implications carefully when drafting and reviewing development management policies.	

All Public Responses to the Whole of Chapter 1

Draft policy	Topic	Summary of comments	Response
Vision & Objectives	Support for heritage and biodiversity principles	Mansfield College supports the vision for the City to provide a healthy and inclusive City with equal opportunities which respects its identity, heritage and maximises the opportunities to enable business, knowledge and innovation to grow. The College also support the principle behind to support biodiversity and to protect the green infrastructure and resources of the City. The College is supportive of the objectives of the Local Plan which align with the College's aim to attract the best students to the City from all social backgrounds and ensuring an appropriate quality of accommodation for all who study in the City.	Support noted.

Draft policy	Topic	Summary of comments	Response
Vision & Objectives	Maximising delivery of homes	All opportunities must be taken to deliver new homes on sites within the City's boundary that are suitable, available and deliverable and meet the requirements of national planning policy. Those opportunities can and must include the development of sites that are in the Green Belt	The Green Belt has been assessed for opportunities, although much of it is functional flood plain, of high importance for wildlife or well used parks, etc, and is not available or developable.
Vision & Objectives	Reducing inequalities	Would like stronger & explicit reference to the following principles for reducing inequalities: agency & participation – many residents feel excluded from decision making & shaping policies, would also like more tangible opportunities for neighbourhood-level involvement in specific developments. Eg neighbourhood plans, especially in economically-marginalised areas; working with community anchor organisations; more transparency and community involvement in spend of CIL and S106 eg via community covenants; ensure that those who experience housing inequality are given opportunity to input to policies eg travelling communities; using tools like citizens assemblies to strengthen participation in complex planning decisions.	The Plan has clear objectives to tackle inequalities and ensure strong communities. It can't, however, control who owns or manages developments.

Draft policy	Topic	Summary of comments	Response
		- Recognise role of Community ownership & stewardship in owning & managing spaces – housing, community buildings, shops, green spaces. Eg stronger mention of community-led and cooperative housing (see Collaborative Housing Hub report). - Strengthening Oxford's Social & Solidarity Economy (SSE) - recognise them as partners in delivering key elements including affordable housing, renewable energy and community facilities.	
Vision & objectives	Environment and landscape setting	The environment is identified as one of the six themes underpinning the Council's vision for Oxford in 2042. We agree that Oxford's environment, particularly its broader landscape setting, is a characteristic feature of the city. Oxford is situated at on the floor of a valley surrounded on all sides by uninterrupted green hills, creating the effect of a 'green bowl' around the city. This 'green bowl' provides the backdrop to historically significant views out from the city and is the reason for the protection of Oxford's view cones within policy. Figure 1.2 sets out the underlying objectives associated with each of the six themes and there is no mention of Oxford's broader landscape setting. The protection of the characteristic landscape setting of the city essential to its semi-rural identity should feature more prominently within the objectives associated with Oxford's landscape.	The objectives do cover the need to respect heritage and the importance of green spaces.

Draft policy	Topic	Summary of comments	Response
		We recommend that these objectives are changed to highlight and reflect the significance of Oxford's wider landscape setting.	
Vision & objectives		Worcester College can confirm that it supports the wider visions and objectives set out in the draft Local Plan, with particular support for the acknowledgement of the need to support Oxford's reputation as an international destination for high quality education and learning.	Support noted.
Vision & objectives	Support	We consider that the policies contained within the plan are generally positive. We strongly agree with the plan objectives and the three overarching threads to reduce inequality, address climate change and enable a liveable city. However the proof will be in the delivery. The Plan's objectives and strategy (Figure 1.2, pp 13-14) should say more about supporting the use of public transport and sustainable modes of travel over the use of cars. In addition, in line with NPPF para 124, strategic policies should "set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land". We would like to see this principle explicitly recognised within the strategy.	The support is welcomed. The objectives are clear that protection and enhancement of important green infrastructure is a key aim, as is taking: <i>opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city.</i>

Draft policy	Topic	Summary of comments	Response
Vision & Objectives	Not ambitious enough	The Plan does not meet its evidenced need – whether that is standard method derived or economic growth driven. Lack of affordability undermines economic growth and prosperity and works against the Vision objectives in respect to healthy and inclusive communities and equal opportunities for access to all basic needs to include homes, health, employment, nature and community infrastructure. A Plan that does not deliver sufficient homes, whether that be within its own boundaries, or by securing a robust strategy through which needs can be met cross boundary, will not deliver on a Plan vision that strives to achieve social inclusion and support communities that benefit from equal opportunities including as referenced – opportunities for access to housing. Hallam is not suggesting that the Council should water down its ambition. Indeed, the Vision should be appropriate to the City’s prominence, influence and economic success; ensuring those qualities are strengthened and sustained and optimum outcomes for the economy, people and environment are achieved. The Plan must therefore provide a	An overarching thread of the plan is to reduce inequalities, and many policies are intended to work towards addressing this.

Draft policy	Topic	Summary of comments	Response
		strategy to deliver that, with an appropriately planned level of growth.	
Vision & Objectives		Lincoln College support the Plan's overall spatial strategy.	Support is noted.
Vision	Proposed amendment	ChCh generally supports the Vision for Oxford but it does not address two key aspects: 1. the important role that the two Universities play in Oxford; and 2. the acute housing need in the City. The Universities and Colleges play a fundamental role in the social, educational, tourism, and local economy of Oxford, and indeed wider Oxfordshire,. In addition the Universities and Colleges require a functioning ecosystem. Good schools are part of this and access to schools for children of visiting academics is important. The LP42 must encourage and support schools expand and enhance facilities as needed. These points should be recognised in the Vision. Whilst the draft LP42 makes reference to there being a "chronic undersupply of housing", the Vision does not acknowledge this or set out any meaningful approach to addressing it. This should be a fundamental element of the LP42.	The Vision sets out where we think the city should be in 2045. It is not the primary means of setting out how we are going to get there. These points are well covered by other elements of the strategy, including the objective and the strategic policies, as well as by the plan generally.

Draft policy	Topic	Summary of comments	Response
		In terms of the lifespan of the Vision, ChCh notes that the NPPF encourages Local Plans to have a Vision which looks over a longer term period (at least 30 years). In particular, where larger scale development is proposed and to take account of likely timescales for delivery. Whilst this is not a requirement for the LP42 given the lack of large scale development proposals, having a longer term Vision for Oxford (which envisages how Oxford's housing and employment needs will be delivered over the longer term) is important given its inability to meet its identified housing need. To respond to ChCh's comments, the following amendments are suggested to the Vision: "In 2042 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses, the University of Oxford and Oxford Brookes University to prosper. The vision is one which addresses the housing needs in Oxford by making efficient use of land in the City and working collaboratively with neighbouring authorities to address any shortfalls in housing delivery and supporting infrastructure; and supports research and	

Draft policy	Topic	Summary of comments	Response
		development in the life sciences and health sectors which are and will provide solutions to global challenges. The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air. The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.”	
Objectives and Strategy	Support	ChCh supports the objectives for the Plan, which are built off the six themes. In particular the recognition of the help that should be given to Oxford to continue in its role as a national and international destination and support the visitor economy.	Support noted.
Overarching Threads	Support but policies need to go further.	ChCh supports the Overarching Threads to reduce inequalities across the City, and to address climate change. However, the two elements that the Plan does not address in full (as ‘overarching threads’) are housing (see H1 response), and infrastructure/transport (partly because this is for the County Council). The policies need to include flexibility to provide an inclusive society.	Comments noted.

Chapter 2 – A Healthy Inclusive City to Live In

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Headlines for Chapter 2:

- General consensus that housing is needed in Oxford and general support for more affordable housing
- Confusion around the term 'affordable housing'
- General support for affordable housing contributions policies and some objections
- Majority of support towards the affordable housing threshold with some push to make the threshold higher
- Commentary about using empty homes and buildings for housing • Some respondents preferred proposed alternative policy options

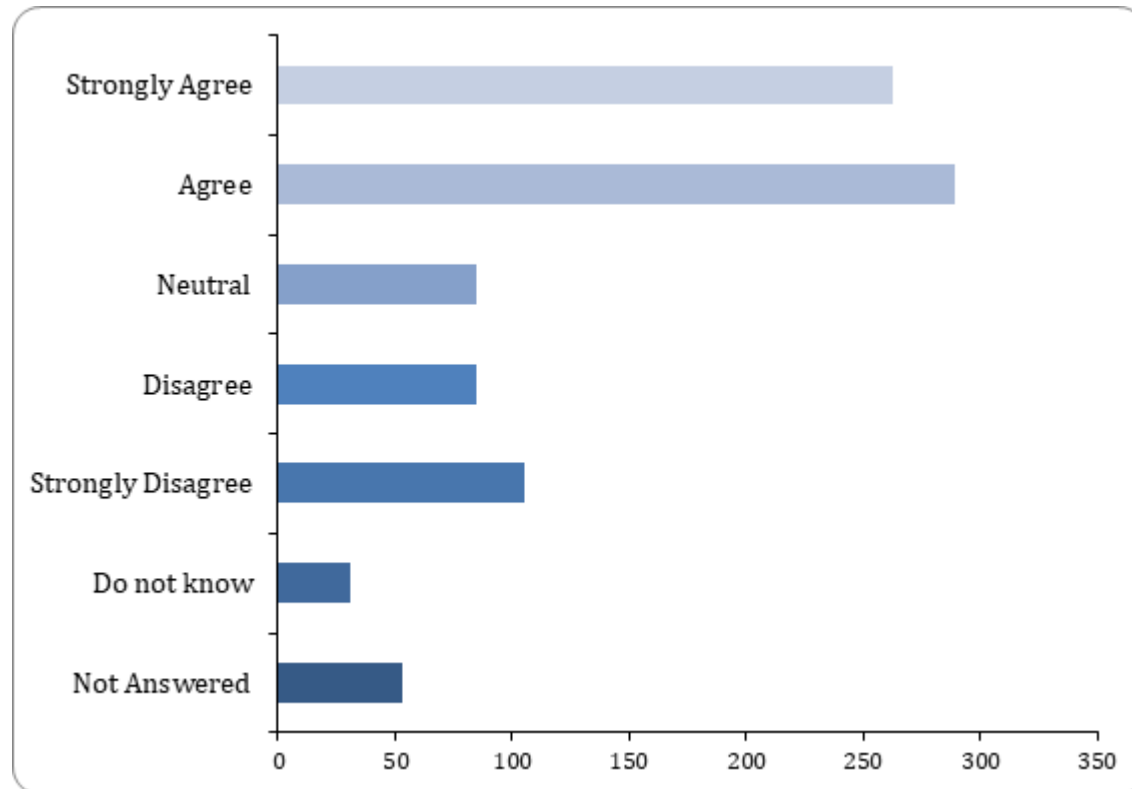
Short Questionnaire Responses

Affordable housing

We have used up-to-date evidence of costs and profits in new developments to set an affordable housing requirement- we are proposing that 40% of new developments with more than 10 homes should be affordable, and 80% of those affordable homes

should be social rented housing as this is the most affordable type to best meet needs. To what extent do you agree with this approach?

There were 858 responses to this part of the question.



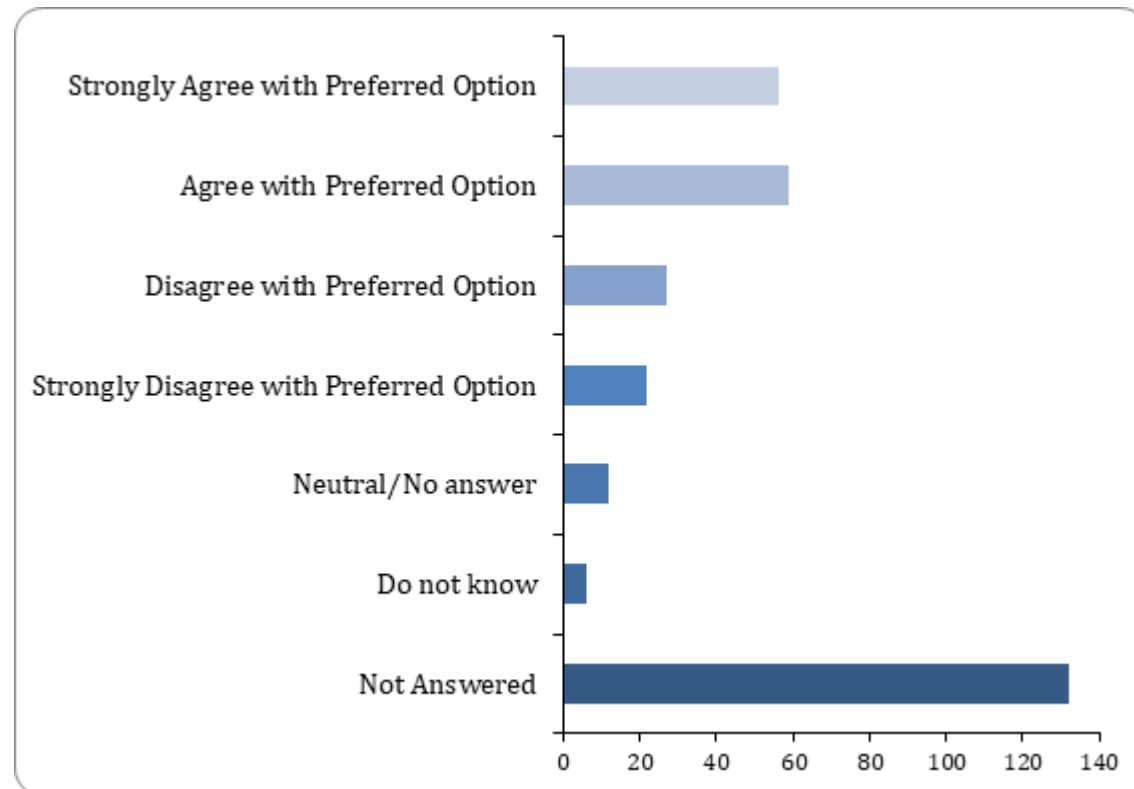
Option	Total	Percent
Strongly Agree	263	28.87%
Agree	289	31.72%
Neutral	85	9.33%
Disagree	85	9.33%

Strongly Disagree	105	11.53%
Do not know	31	3.40%
Not Answered	53	5.82%

All Public Responses – Draft Policy H1

Please tell us what you think about policy options set 001a (draft policy H1): Housing requirement for the plan period.

There were 182 responses to this part of the question.



Option	Total	Percent

Strongly Agree with Preferred Option	56	17.83%
Agree with Preferred Option	59	18.79%
Disagree with Preferred Option	27	8.60%
Strongly Disagree with Preferred Option	22	7.01%
Neutral/No answer	12	3.82%
Do not know	6	1.91%
Not Answered	132	42.04%

Draft policy	Topic	Summary of comments	Response
H1	Housing requirement - Exceeding the SM	Would support a housing requirement above the level calculated by the SM. The NPPF para 62 confirms this is possible and that it should not normally have to be thoroughly justified at examination. BP001 does not reference this change in approach. If the sub-region is to meet its economic potential and address the affordability challenge the housing requirement and level of unmet need must be increased. Calculate that from 2036 there is a deficit of 4,550 homes 2,376 homes 2036-2040 (1,087-493), plus 2,174 homes 2040-2042 (1087*2).	The level of unmet need needs to be calculated over the Plan period and discussions with neighbouring districts will take place about meeting that need over the Plan period. A higher than SM housing requirement in Oxford, given its limited capacity, would be essentially setting a requirement for outside the city and would need robust justification at examination, and is not considered to be a justifiable approach.
H1	Housing requirement – using Standard Method	Support the SM housing need figure of 1087dpa (21,740 over plan period) To unlock Oxford's economic potential, its full housing requirement must be met, as housing supports job creation and regional growth. This requires a coordinated cross-boundary strategy with neighbouring authorities, as confirmed by planning inspectors. The housing need should follow the standard method unless there are exceptional reasons to adjust it.	Policy H1 calculates housing need using the Standard Method, and latest government affordability data.

H1	Housing need is higher than Standard Method	We acknowledge that efforts to secure higher growth in the Local Plan 2040 failed at examination. However, basing a housing requirement simply on a calculation of capacity, risks continuing to exacerbate a shortage in housing supply. Should first conclude duty to cooperate	Duty to cooperate discussions cannot be concluded before the capacity is confirmed through the examination process, but discussions are in train.

Draft policy	Topic	Summary of comments	Response

		discussions, before taking forward a strategy that knowingly suppresses growth. A significant uplift in the delivery of housing will be essential for contributing to the growth ambitions, which we expect to be established by the Oxfordshire Growth Commission and for the Oxford-Cambridge Corridor. Only when these ambitions are fully understood can there be a full understanding of housing needs to assess against the Standard Method to establish a housing requirement that is able to take account of the exceptionally strong economic growth in Oxfordshire, which, if not supported by adequate provision of housing will continue to lead to problems of affordability, inaccessibility of housing and increased unsustainable commuting patterns. Whilst the previous Local Plan Inspectors did not conclude there was sufficient evidence to depart from standard method, that does not infer that the Council's should now settle for standard method as an indication of actual need. Need to undertake more work to understand and identify the actual growth requirements for the city and then work with neighbouring authorities to consider how the needs can best be met. Should reflect locally the Oxfordshire Leaders Joint Committee (OLJC) and the Vision for Oxfordshire. There is a strong case for a higher level of growth than is being provided for in the City Plan, whilst recognising that Oxford City has limited capacity (and this was the case when the adopted City	The Oxford Local Plan 2045 cannot consider the growth needs for all of Oxfordshire. Use of the Standard Method to assess housing need in Oxford is considered to be the most appropriate approach at the current time.

		Local Plan was prepared); it is considered that it is incumbent upon the	

Draft policy	Topic	Summary of comments	Response
		authorities to work together to deliver the significant boost to the supply of homes (following on from the Growth Deal) in accordance with the NPPF and support both the local and national economic objectives some of which are outlined above. It is considered that provision should be made for a higher housing requirement than that based on the Standard Method (this level of growth should not be dismissed purely on the basis that there is insufficient capacity) and we would therefore urge the Council to urgently examine what is needed to support economic growth of Oxford and its hinterland and recognise that the housing needs of Oxford may well be higher than those proposed by the standard method and in doing so explore this strategic issue with neighbouring authorities through the duty to co-operate.	

	Capacity calculation and plan period	The supply would also need to be adjusted; it is noted in Background Paper 001 that the capacity work carried out for the preparation of the Oxford Local Plan 2040 showed a supply/capacity of 9,851 dwellings for the period 2020-2040 i.e. an average of 453 dwellings per annum. (it is noted that this work is being updated) however, the plan period is inconsistent with national policy so delivery from the three years preceding the assessment of housing need will need to be removed from the total housing supply expected in Oxford City. Agree that: "Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply." Recognise that Oxford City is a constrained area for development: There is the Green Belt, Flood Zones, and the setting of heritage assets that all impact on available development land. The Council will	The capacity has been updated and recalculated to reflect the 2025-2045 plan period.

Draft policy	Topic	Summary of comments	Response
		need to work with landowners, and its local authority neighbours to explore all options for delivering new homes (including Green Belt review), ensuring that every potential avenue for housing is explored before a 'capacity cap' is identified.	

H1	Plan period start date	HBF does not agree with the Council's decision to use a plan period that starts in 2022, over three years prior to the local plan's expected submission. Such an approach fundamentally misunderstands the standard method which takes account of past supply through the affordability uplift to determine housing needs moving forward. Local plans are meant to look forward at what needs to be delivered with past delivery being taken into account through the standard method. This is clear from paragraph 2a-004 in Planning Practice Guidance (PPG), which notes that when setting the baseline for the standard method the most recent assessment dwelling stock is used.	Since the Regulation 18 consultation, the Plan period has been adjusted to a 2025 start date, with a plan period now of 2025-2045.
H1	Sources of sites and prioritising brownfield first	While it is right for the Local Plan to maximise delivery on previously developed land (PDL); where housing and employment needs cannot be met on such sites, Greenfield sites will be required not only for the overall quantum of development but also to create a rolling supply of housing land (five-year land supply). Capacity should include the Allotments as a housing development site. No stone should be left unturned. Many of the proposed new site allocations for housing are on greenfield land. These should only be approved once all opportunities to use brownfield land have been exhausted. Some of the proposed building sites seem to conflict with many of the advertised priorities	Greenfield sites and allotment sites are both included in the Strategic Housing Land Availability Assessment (SHLAA). The only types of sites not included are those with national designations which preclude development, such as SSSI and Flood Zone 3b (greenfield). National policy establishes that development on brownfield should be prioritised, but not enough sites can be identified on

Draft policy	Topic	Summary of comments	Response

		of the Local Plan, including retaining green infrastructure and respecting heritage sites.	brownfield alone to meet Oxford's housing need so some greenfield sites are also needed, whilst also balancing other priorities and objectives of the Plan.
H1	Should encourage conversion of employment to residential	Plan should encourage the conversion of vacant employment uses (offices, retail) into residential use. The delivery of residential units within the city centre and district centres would bring great benefits. More life would be breathed into city streets, such as Cornmarket Street, if there was a mix of residents, workers and tourists. The preference for mixed use developments should also be mentioned within this policy. While the provision of dwellings is important, to do this successfully within urban centres the activation of ground floor units must be retained. This will help to protect the existing public realm. There is a chronic lack of affordable housing in Oxford. It is such an expensive city in which to buy or rent a house in that essential workers struggle to find a home here and instead travel in from outside the city, contributing to the appalling gridlock on our roads with which all residents are all too familiar. The Plan should seize the opportunity to convert existing brownfield sites into affordable housing rather than turning them over to new work sites (maximizing employment) that will only add to the number of commuters. Empty retail and office space should be actively targeted to create affordable housing.	The plan supports the conversion of employment sites to residential in Policy E1 where the landowner is interested in doing so. Many employment sites in Oxford also qualify for permitted development rights for conversion of office to residential. A particular challenge in recent years is that retaining employment uses often provides a higher return to the landowner.

H1	Process for addressing	there is still uncertainty as to what Oxford's unmet housing needs are without an up to date housing land availability assessment but on the basis of those plans being progressed elsewhere in Oxford it would	Duty to Cooperate work with neighbouring district councils is

Draft policy	Topic	Summary of comments	Response

	unmet housing need	appear that there will still be some unmet housing needs. It will therefore be necessary for OC to work with its neighbours to identify additional supply to meet these needs as part of their duty to cooperate. Agreements must be reached that unmet needs will be met in full and that when new plans are prepared, they will maintain commitment to meeting the housing needs of Oxford and not seek to use preexisting supply to address their own needs, leaving Oxford City with substantial unmet housing needs. Without such agreements there can be no certainty that Oxford's need in their latest plan will be met in full. Para 2.3 explains no process for how the unmet need figure to 2042 will be accommodated, this must be fully resolved before Reg 19. Recent updates to national planning guidance have increased the calculated housing need for Oxford and surrounding areas. Given government ambitions and the work of the Oxford Growth Commission, further analysis is needed to potentially raise housing targets, considering economic growth and housing affordability challenges. After this, the emerging plan should identify how much housing can be accommodated within Oxford itself, with the remaining unmet need addressed through agreements with neighbouring authorities. The previously agreed unmet housing figure (14,300 dwellings) from 2016 now needs updating and reconsideration for the new plan period based on current evidence and collaboration	ongoing to address Oxford's unmet housing need.

Draft policy	Topic	Summary of comments	Response
		Unmet need of 11,889 will have to be agreed with the neighbouring Oxfordshire authorities. It is considered that in order to meet the unmet needs is falls to Oxford City to work with its neighbouring authorities to identify additional supply to meet these needs as part of their duty to cooperate. It is considered that agreements must be reached so that unmet needs will be met in full and to ensure that when new plans are prepared, they will maintain commitments to meeting the housing needs of Oxford and not seek to use preexisting supply to address their own needs, leaving Oxford City with substantial unmet housing needs. Without such agreements there can be no certainty that Oxford's need in their latest plan will be met in full.	
H1	Sites in adjoining districts for Oxford unmet need	It is suggested that the remaining unallocated land and Dalton Barracks and Abingdon Airfield is best placed to assist in providing some of the unmet need through the expansion of Dalton Barracks Garden Village site allocation that could provide an additional 2,500 new homes over the current allocation.	Duty to Cooperate work with neighbouring district councils is ongoing to address Oxford's unmet housing need.

H1	Build to Rent and co-living provision	Consider that the Plan (at Policy H1) should also give positive encouragement to the development of BTR schemes as these are ideally suited to smaller brownfield sites located within city centres that can be constructed at high densities. BTR schemes can also make significant reductions to local housing supply figures as a high number of units can be constructed within a short space of time. The draft Local Plan fails to consider in any detail more modern housing tenures such as build to rent or co-living. Such tenures are actively promoted in the latest iterations of both the National Planning Policy Framework (NPPF) and the National Planning	Whilst the NPPF allows for BTR tenure, these types of developments are unlikely to meet affordable housing needs in the Oxford context because they are still not affordable to many people on Oxford salaries.

Draft policy	Topic	Summary of comments	Response

		Practice Guidance (NPPG). The NPPG within the 'Build to Rent' (BTR) chapter (Paragraph: 001 Reference ID: 60-001-20180913) states "as part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent". Co-living, a form of build to rent, is a relatively new concept of housing which aims to provide a housing option for single person households, who cannot or chose not to live in self-contained homes or Houses in Multiple Occupation (HMOs). In planning terms this housing type is sui generis non-self-contained market housing and is not considered conventional residential, which would fall under Use Class C3. This type of housing is not restricted to particular groups by occupation or specific needs. In addition, communal amenity space is provided in lieu of private floorspace to create a sense of community and encourage social interaction and engagement between its residents. The private units are appropriately sized to be comfortable and functional for tenant's needs and generally include en-suite bathrooms and limited cooking facilities (e.g. a kitchenette), but with access to larger kitchen facilities elsewhere in the development. It is important to note that the National Housing Space Standards do not apply to this type of accommodation due to its key attribute as a 'cost-effective' alternative form of housing, which would be proven negligible should unit sizes be increased. It is not clear as to whether any assessment has been undertaken into the potential requirement for build to rent homes.	

Draft policy	Topic	Summary of comments	Response
		A plan-led solution to supply will help to ensure that housing is delivered in the most sustainable locations, and that it meets the needs of groups with specific housing requirements, as set out in the NPPF at Section 5. The Draft Plan's Paragraph 2.38 notes this also. Therefore, there is an overriding principle to facilitate the supply of housing to meet specific needs in the city, this should include housing targeted at single households, including co-living. Co-living housing is for single households and in planning terms, falls under sui generis non-self-contained market housing. Therefore, requirements applicable to conventional residential development (Use Class C3) are not applicable to this housing type, and therefore any new policy (or alternatively an extension to Policy 14) should address: • Room space standards – minimum 18 sqm typically. • Internal and external amenity space requirements. • Affordable housing approach – assume PIL typically (see Para 2.9, forth bullet). • Management expectations. • Preferred locations – assume central and accessible typically such as City and District Centers.	
H1	Should go further to find sites for housing	Where major developers are being permitted to use part of their employment sites for other uses, affordable/employee housing should be the first consideration. Specific, proactive allocations should be made for housing, for example on empty retail and office space.	Allocations can't be made for sites where no landowner interest is present. However, where it is, then sites are allocated where appropriate.

H1	Housing Requirement	CPRE support the revised methodology used to ascertain a lower housing need from that identified in the previous Local Plan. We seek	Clarity on unmet need is given in the Draft Submission Local Plan.

Draft policy	Topic	Summary of comments	Response
		an emphasis on all housing need to be provided within the City boundaries, making best use of existing allocated sites, and particularly support the emphasis and policy on existing allocated employment sites reverting to housing. We seek clarity on the unmet housing numbers (if any) which the city council will be seeking to be met by its neighbouring districts and understand that work in being undertaken in this area. We seek all efforts to be made that any such unmet need can be accommodated on existing allocated sites, using higher densities and good design. We will strongly oppose any proposal for unmet housing need to be met in the Oxford Green Belt or in the open countryside generally. CPRE Oxford City seek further interim consultation when detailed housing numbers are available . It is not possible to comment constructively without sight of the overall and detailed site specific housing numbers. It is vital that a further interim stage of consultation is undertaken when housing numbers become available in order that the City meets its duty to cooperate with neighbouring districts and democratic consultation can be incorporated. It is not acceptable that there will be no sight of the detailed housing numbers until the Reg 19 stage, when comment can only be given on legal and compliance grounds.	All attempts have been made to find capacity for housing.

		Therefore, an interim consultation on housing numbers must be undertaken prior to Reg 19.	
H1	Delivery through small sites	It is ... unclear as to whether the Council will, as required by paragraph 73 of the NPPF, be delivering 10% of its housing requirement on sites of one hectare or less. Whilst the HBF recognises that Oxford is constrained it should still seek to identify and allocate as many	Sites with a capacity of more than 10 are allocated, and these really are quite small sites, which Oxford does heavily rely on.

		small sites as possible through this local plan rather than rely on windfall	Indeed there are few large sites in Oxford at all.

Draft policy	Topic	Summary of comments	Response
		from such sites. Recent research by the HBF has found that there are 85% fewer small house builders today than there were 20 years ago and that of a survey of 202 SME house builders 87% said they were considering winding up their residential activities in the next three years. Whilst this decline is due to a range of factors, more allocations of small sites would ease the burden on many SME developers and provide more certainty that their scheme will be permitted allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.	Sites smaller than 20 do not need a site allocation as there will not be anything site- specific that needs to be said in a site allocation policy, but the generic policies of the plan are adequate.

H1	Evidence underpinning housing need	The HENA used for the calculation is based on a set of mainly generic metrics and calculations ignoring most of the special factors in Oxford. The representation then goes on to critique the HENA.	HENA evidence not relied upon. It was the supporting evidence for the LP2040 (withdrawn). This Emerging Local Plan relies on Government's Standard Method for its assessment of housing need.
	Exclusion of sites under 10 homes (HENA)	The Government Planning Practice Guidance suggests sites of 5 units or more should be included in Housing and Economic Land Availability Assessments, but Oxford City Council has excluded all sites from a Site Assessment under 10. Important sites listed below (eg: Policy XXX etc) are in their relevant sections are NOT included in the Plan which therefore is unsound as consultation and assessments of sites with important constraints have not been assessed and the community has not been given a chance to give input.	
	Modification/ amendment	Three modifications are suggested, 1. A rerun of the HENA Calculating the actual housing need	

Draft policy	Topic	Summary of comments	Response

		2. Inclusion of all Sites with less than 10 houses (Listed in each Area section) 3. A report detailing how HENA representations were taken into account (which they were not)	HENA evidence not relied upon. It was the supporting evidence for the LP2040 (withdrawn). This Emerging Local Plan relies on Government's Standard Method for its assessment of housing need.
H1	Student accommodation ratio	A significant proportion of the housing supply is a result of student accommodation. This is accounted for in the supply with a 2.5 student bed spaces considered the equivalent to one dwelling. This is 2.5:1 ratio is taken from the Housing Delivery Test which is based on national data as to students per dwelling. However, given the significant amount of student accommodation being built in Oxford the HBF would suggest that a local assessment is required to see whether this is accurate for Oxford and the contribution of student accommodation to overall housing supply is not being overestimated.	The HDT ratio of 2.4 will be applied when measuring Oxford against the HDT, so applying a different ratio would not be appropriate.

H1	General comment	Planning for the right number of new homes is vital to the (OUH) Trust. This is to meet the needs of staff (and affiliated students), and also the continued sustainability of the wider community of Oxford. While the Council will need to maximise delivery on available sites; the Local Plan will inevitably set a “capacity constrained” housing requirement. The Trusts agrees that: “Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply.” The Trust recognises that Oxford City is a constrained area for development: There is the Green Belt, Flood Zones, and the setting of heritage assets that all impact on available development land. The Council will need to work with landowners, and its local authority neighbours to explore all options for delivering new homes (including Green Belt review), ensuring that every	Comments noted.

Draft policy	Topic	Summary of comments	Response
		potential avenue for housing is explored before a ‘capacity cap’ is identified. The Trust welcomes the flexible approach that is being taken to the proposed development allocations on its land, which includes the potential for employer linked housing where appropriate, which could contribute to meeting the overall need for new homes in Oxford.	
H1	Heights	When there is such a great need for housing, confusion around only 57 stories	There is no 5-7 storey limit in the plan.

H1	Support for more flats	Build more flats to meet need	The minimum housing numbers assumed will sometimes mean flats are likely to be the solution, particularly in the city centre and district centre, but there are considerations, including viability.
H1	Capacity/constraint based housing requirement	While we broadly agree with the preferred option, which would provide a capacity/constraint-based housing requirement based off what is deliverable within Oxford City Council's boundaries, we consider the policy should include a fall-back allowing for higher density development in the case neighbouring authorities are unable to meet the shortfall in identified housing need. We consider this caveat to be pertinent given the recent breakdown in negotiations for the Oxfordshire Plan 2050.	The densities applied are already in the spirit of maximising capacity.
H1	Disagree with Standard Method Approach	Oxford should start with the full Standard-Method figure as a minimum and treat capacity as elastic: permit gentle densification of suburbs, up-zone transit corridors and retail parks for mid-rise mixeduse blocks, scrap parking minimums, and allow residential on employment land unless a net jobs loss is proven. A rules-based, form-led code would let bottom-up market forces deliver homes swiftly while keeping the city compact, liveable and globally competitive.	These measures are part of the plan, but assumptions of capacity are based on evidence of what may come forward, and can't simply be aspirational numbers based on assuming something will happen that there is no suggestion will practically be able to happen
Draft policy	Topic	Summary of comments	Response
			(e.g. densification across whole estates).

H1	Prioritise housing over employment	More employment might be driving up house prices, meaning people have to commute which isn't sensible in light of the Climate Emergency doesn't make sense. The population needs a good cross section of people to thrive.	Comment noted.
H1	Ambiguity around unmet need	Agreement with standard method but unclear where unmet need figure has come from and why the plan period runs to 2042.	The plan period now runs until 2045. The unmet need is the difference between the calculated capacity and the housing need (as calculated by the standard method).
N/A	Identifying housing sites	All sites earmarked for development over 3 units should be shown as Preferred Options – not merely those over 10 units. This conceals the true impacts of development on city's green spaces.	Sites with development potential are identified within the Strategic Housing Land Availability Assessment (SHLAA). Sites which are unlikely to deliver 10+ dwellings net gain are not included as site allocations.

Statutory Consultee Responses – Draft Policy H1

Cherwell District Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

H1	Note that the Government's standard method is to be used and this is welcomed. The Local	Dialogue is ongoing with the other Oxfordshire districts about our	Dialogue to be ongoing.
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	Plan 2036 contained a level of unmet housing need for which the other Oxfordshire districts made provision for. Cherwell committed to delivering 4,400 homes in 6 partial review sites. No request has been made yet by Oxford City Council for help accommodating any additional unmet need. Any additional unmet housing need must be rigorously examined and Cherwell DC would want to explore through Duty to Cooperate process whether the city can accommodate any additional unmet need within its own boundaries.	capacity assessment and likely request for unmet need. The agreed unmet need links to the 2036 Plan. That leaves 6 years of unmet need at the end of the 2042 Plan. The need might not be greater in numbers, but will be extended in years, and an acknowledgement of this from our neighbours would be helpful. We understand that we must attempt to find housing capacity where we can, but a lack of acceptance of whether or not we have cannot mean that discussions of the unmet need in the plan period to 2042 cannot take place.	All methodology and details behind capacity calculations to be shared. Formal request for unmet need to be made.

Draft Policy	Summary	Response	Outcome
Draft Policy H1	Support the use of SM to inform Oxford's housing needs. We welcome the fact that with the capacity-	The SM is the basis for the calculation of the housing need.	Engagement on capacity calculations has been ongoing.
Draft Policy	Summary	Response	Outcome
	based housing target and unmet need of 14,300 already taken by surrounding district there is more than enough to cater for the amount of unmet need this plan generates. Request, as has been committed to, engagement on capacity calculations prior to Reg 19.	At the Regulation 18 stage it was not clear whether the unmet need would be above or below the 14,300 previously agreed for the previous round of local plans. The SHLAA to support the Regulation 19 consultation finds a capacity of 9,267 over the Plan period, which gives an unmet need of 12,473.	

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy H1 Housing Requirement	Strategic Planning Using a capacity-based requirement will not meet the housing need identified through the Standard Method (Dec, 2024) and will generate an element of unmet housing need. The exact amount of unmet housing need was not set out in the PO document.	Noted.	No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

	The County Council will review any updated work on capacity when it is available. The Reg. 18 document only discusses the housing requirement in Oxford and does not discuss how the arising unmet need will be addressed.	Noted.	No Action Required
	The County is keen to understand the implications of any additional unmet housing need arising as new strategic housing allocations are likely to have infrastructure requirements (e.g., transport/ education), and other issues relevant to the County's statutory functions.	Noted.	No Action Required
	Concerned about trip generating growth contrary to LTCP targets and whether the cost of infrastructure can be met.		
	The County Council wishes to be involved in future discussions about housing need numbers and can act to support the Districts and City in highlighting issues where there are differences in approach and offering	Noted.	No Action Required

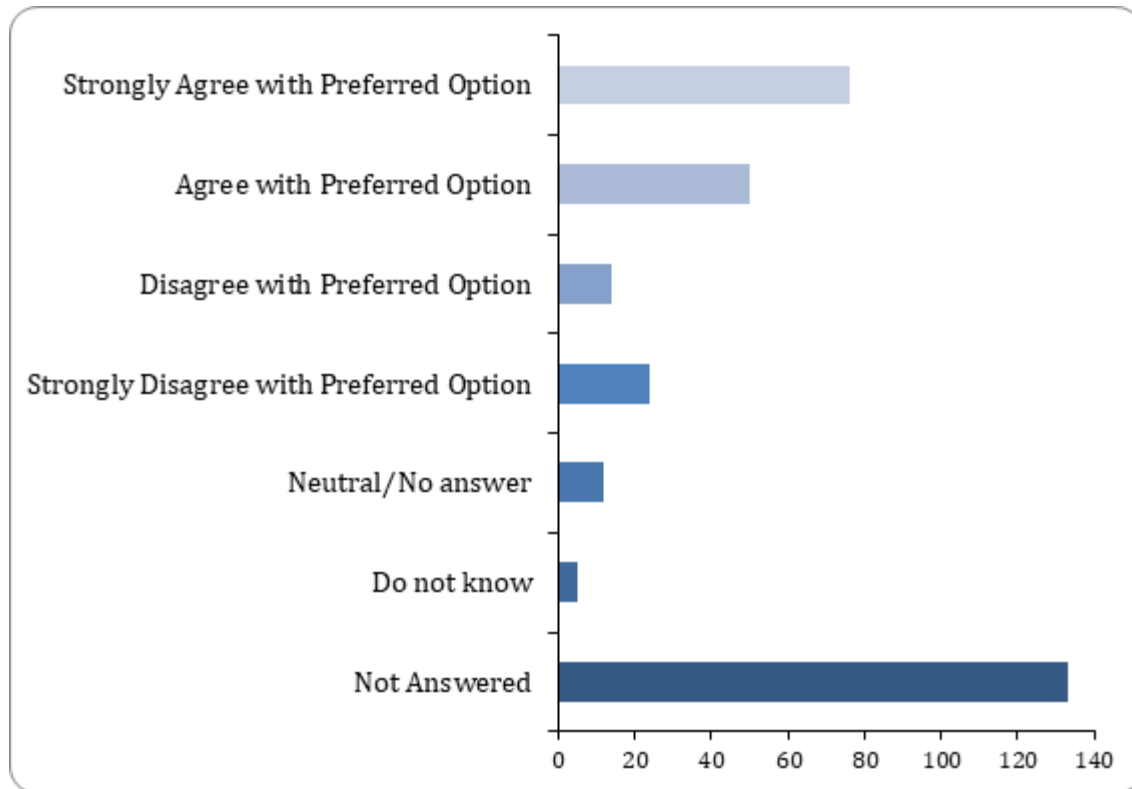
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	a way forward for example in relation to infrastructure needs. The County Council's position has been, and continues to be, that any site allocations should be well located in relation to the people they are intended to accommodate. Therefore, Oxford's unmet housing need should be met on sites close to Oxford, either with good existing walking, cycling and public transport links or the ability to provide such links funded from development. The number of homes to be delivered in the 2022-42 plan period (9,851) is less than the number of homes to be delivered in the 2016-36 plan period (10,880). The Reg.19 consultation should set out the numbers and detail the reasons such as whether landowners are now not seeking to redevelop their sites and why as there could be scope for further increasing the housing requirement.	We look forward to continued discussions with district and county colleagues as we seek to resolve issues of unmet housing need and associated infrastructure implications. Noted.	Continue relevant discussions through DTC Forum/ etc. No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
		The Reg. 19 Plan and supporting evidence will include SHLAA (Strategic Housing Land Availability Assessment), which includes details of landowner ambitions for sites in the city.	No Action Required

All Public Responses – Draft Policy H2

Please tell us what you think about policy options set 002a (draft policy H2): Affordable housing contributions.

There were 181 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	76	24.20%
Agree with Preferred Option	50	15.92%
Disagree with Preferred Option	14	4.46%
Strongly Disagree with Preferred Option	24	7.64%
Neutral/No answer	12	3.82%
Do not know	5	1.59%
Not Answered	133	42.36%

Draft policy	Topic	Summary of comments	Response
H2	Prioritising Social Housing	Social rent should be prioritised as past policies in Oxford have not made homes genuinely affordable. Policy needed on limiting the number of unoccupied houses e.g. planning restrictions on short-term lets.	Social rent is prioritised.
H2	Objection to reducing affordable housing target	Object to reducing affordable housing from previous target of 50% to 40%. Government policy now requires social rent, so this is a missed opportunity.	The Viability evidence indicated that it was not feasible to continue the 50% affordable housing target for this plan period. Whilst some developments would be able to deliver this rate of contribution, a significant proportion would not.
H2	Amend policy to remove viability provision	Whilst supporting the intent of Policy H2, the wording must be altered and strengthened to ensure it delivers results. Developers often cite viability to replace social rent homes with other “affordable” options, and this must be prevented. It is CPRE Oxfordshire’s view that sites which are not viable for social housing for rent should not be considered.	The NPPF requires that developer contributions should not make sites unviable

H2	Viability - justification needed for affordable housing contribution above national 20%	National policy requires a 20% affordable housing discount (Paragraph: 002 Reference ID: 60-002-20180913) so any diversion from this must consider the current viability and deliverability challenges facing the residential sector. Request that regards be given to development viability on a site-by-site basis.	The 20% minimum rent discount set out in national guidance is specific to the category of affordable private rent homes. It is not a general principle for all affordable housing types.

Draft policy	Topic	Summary of comments	Response
H2	Application of policy to BTR	More clarity needed on affordable housing requirements for build-to-rent developments. National policy states that '20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme' (Paragraph: 002 Reference ID: 60-00220180913).	Whilst the NPPF allows for BTR tenure, these types of developments are unlikely to meet affordable housing needs in the Oxford context because they are still not affordable to many people on Oxford salaries.

H2	Viability study – testing of typologies	In the plan wide viability assessment (BNP Paribas 2023) it is unclear how sheltered or extra care typologies have been tested. Typology 19 is described as 'C2 care scheme - flats' extending to 60 flats with an average GIA of 4,376 m2. It is unclear how non saleable floorspace has been factored in. Unless further testing has been undertaken specifically examining a full range of older person housing typologies, it appears that there is insufficient evidence regarding the viability of this typology. The typology tested appears to be a hybrid typology incorporating various elements of extra care and 'a care scheme'. Some clarity is required on the assumptions made to ensure that all appropriate costs are included and realistic so that a judgement can be made in respect of traditional sheltered and extra care typologies.	The requirement for affordable housing contributions from older persons accommodation applies only to selfcontained units, and therefore excludes most typologies.
H2	Exemption of older persons and specialist housing from affordable housing requirement.	Various examples of LPs where affordable is concluded as not viable for older persons and specialist housing, so those developments are exempt from affordable housing contributions. Eg Fareham policy HP5, Swale LP, and Birmingham & Charnwood LP. Oxford should examine a similar exemption. By not adopting a different policy in respect of housing for older people, the policy is adding uncertainty and an unnecessary layer of cost and delay to such proposals.	The Plan Viability Assessment indicates that in the context of Oxford, a significant proportion of these development typologies would be able to deliver affordable

Draft policy	Topic	Summary of comments	Response

		See the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note')). The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values. We are also aware that the RHG Briefing Note is being updated and indeed we are informing that process. Sales and marketing costs for older persons housing schemes are typically 6% of GDV and this should be used within the older persons modelling. Sales periods of older persons' housing schemes are typically longer for retirement and extra care housing than general needs housing. There is a typical 18 month build period before sales can commence. Sheltered and Extra care schemes cannot be phased but must be fully operational and completed from month 1 of sales/occupation. As detailed within the RHG Briefing Note, once sales commence a rough guide is that 40% of units will be sold at the end of the first year of sales, 30% during the second year of sales and 30% during the third period. This should be considered within the viability modelling and amended accordingly. These longer sales periods should therefore be incorporated into the Viability Assessment, especially for sheltered housing. It is recommended that a standard allowance of £5,000 per unit is assumed as a typical average empty property cost - to cover Council Tax liability on unsold units and service	housing contributions as part of a viable proposal.

		charges (which will be applicable to the whole building from day first resident moves in). This	

Draft policy	Topic	Summary of comments	Response
		increases to £10,000 for extra care accommodation to reflect higher costs particularly in maintaining care, communal and catering facilities, staff, and services and reflecting a slower sales rate than Retirement Living. PPG sets out that 'For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers.' However, for specialist housing for older people there is a clear precedent for a return of not less than 20% of gross development value primarily because of the risks associated with such developments. This is consistent with the Inspector's conclusions for appeals such as McCarthy Stone proposal at Redditch (Appeal Ref: 3166677), Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137) and the Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412) in 2019. 20% profit should therefore be assumed for specialist housing for older people.	
H2	Support for policy	We support this policy and believe that new affordable homes should be at genuinely and permanently affordable social rents.	Support is welcomed

Draft policy	Topic	Summary of comments	Response
			for Build to Rent developments.
H2	Appendix 2.1 - Method for calculating affordable housing contributions	'D' is not described sufficiently clearly and should be clarified.	Noted, will review definitions in Appendix.
H2	Glossary Definition of affordable housing	Refers to glossary definition of affordable housing (page 184 of draft document). It is unclear whether the phrase Affordable Private Rent used in a iii) and Affordable Rent used in a i) are intended to be the same.	Affordable rent is defined as at least 20% below market rents, and <i>Affordable Private</i> rent would also be at least 20% below market rents but is a class of affordable housing specifically defined by national policy

Statutory Consultee Responses – Draft Policy H2

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy	Summary	Response	Outcome

Draft Policy H2	The preferred tenure split of 80% social rented does not align with the Specialist Housing Needs Assessment, which gives a 65:35 split.	The tenure split is aimed at prioritising and maximising social rented housing because it meets the needs of those in greatest housing need.	No further action.

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

1871

Policy H2 Delivering Affordable Homes	Strategic Planning and Infrastructure teams		
	It is disappointing that the AH requirement is being reduced from 50% to 40%. We understand that the 40% requirement is based on viability.	The Local Plan viability study provides evidence for affordable housing and other proposed policy requirements	No Action Required
	It is not clear why delivery of the government mandated proportion of 'First Homes' is not expected.	Footnote 31 to paragraph 66 of the December 2024 NPPF sets out that First Homes are no longer mandatory but instead can be delivered where local planning authorities judge they meet local need.	No Action Required
	In relation to 'unmet need' housing sites, would the emerging Oxford Local Plan's 40% requirement undermine the currently adopted 50% requirements in neighbouring district's local plans. We have also raised a similar query in our comments on the recent Cherwell Local Plan Regulation 18 consultation where 30% affordable housing is proposed to apply to new	Sites allocated in neighbouring authorities' local plans to meet Oxford's unmet housing need are outside the jurisdiction of the city. It is for each individual authority to set policies for planned development in their areas.	No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

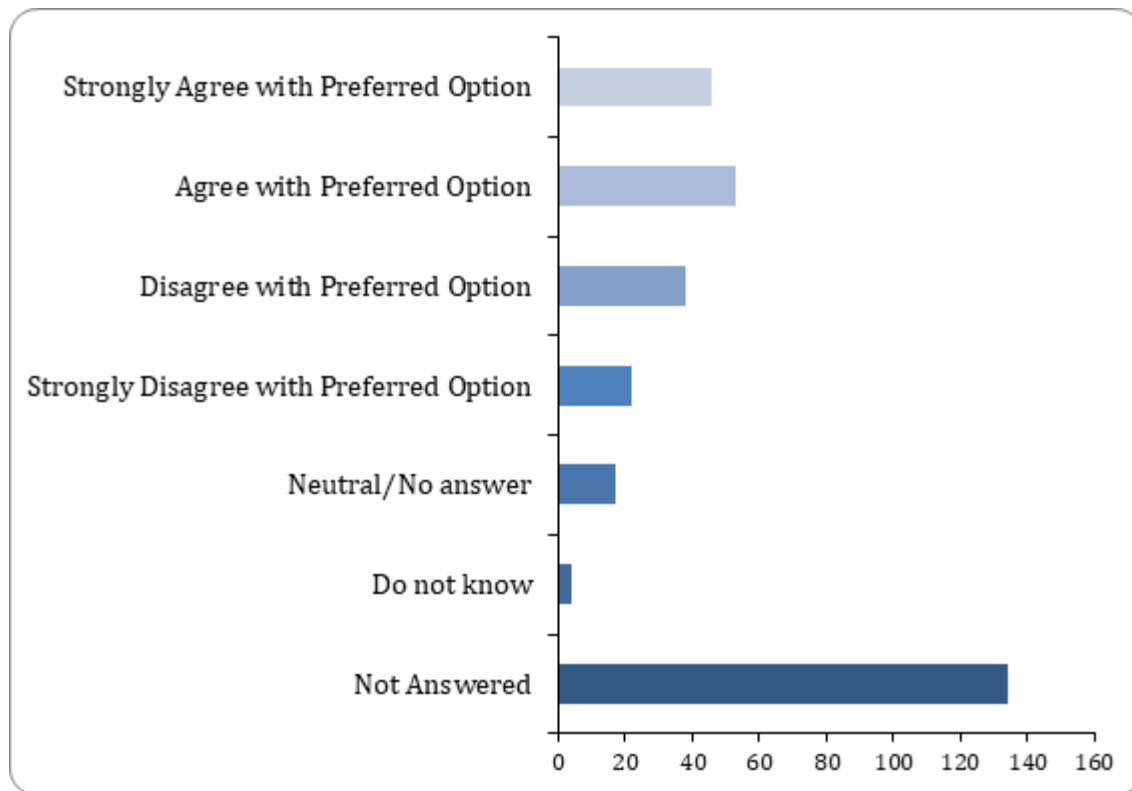
	sites, but 50% affordable housing requirements apply to some existing allocated sites. The County Council has a particular interest in affordable housing given its social care role. We want to see provision being made for affordable forms of housing catering for those who are older or who have specialist needs, particularly in the form of affordable extra care housing which is set in our Market Position Statements on this topic. In the Districts, we are asking for a requirement in those Local Plans to provide an affordable extra care housing development of at least 60 units as part of the affordable housing component of very large sites. We do not think there are any proposed allocations in Oxford City where such a requirement would be suitable, as sites are smaller. Even Oxpens is expected to be an unsuitable site for such a requirement. We anticipate some extra care housing being delivered at a small number of sites in adjacent Districts to meet the City's need e.g. at Bayswater Brook. We would be	Noted (see box H4 below). Noted.	No Action Required No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	concerned if a reduced affordable housing threshold makes it more difficult to get affordable specialist housing provided on sites.		

All Public Responses – Draft Policy H3

Please tell us what you think about policy options set 002b (draft policy H3): Affordable housing: financial contributions from new student accommodation.

There were 180 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	38	12.10%
Strongly Disagree with Preferred Option	22	7.01%
Neutral/No answer	17	5.41%
Do not know	4	1.27%
Not Answered	134	42.68%

Draft policy	Topic	Summary of comments	Response
H3	Support for policy	The approach to the supply of conventional affordable housing, as a financial payment which is subject to viability (as set out in Policy H3) is broadly supported. Support the caveat which does not require affordable housing contributions from student accommodation which is on sites which are within an existing or proposed University or College Campus site. With regards to PBSA development that falls outside of these categories, we recognise the PBSA to conventional housing ratio is 2.5:1, we therefore consider this policy to be appropriate. The University should be providing a lot more houses. The City is turning into a student campus. Developments are for students at the expensive of residents who actually pay council tax. The Universities should be made to contribute more to the City and residents.	Support is noted. The emerging policy seeks financial contributions towards the delivery of affordable housing from PBSA developments of 24 or more student units, reflecting the 2.4 ratio set out in the Housing Delivery Test measurement rulebook.
H3	Objection to policy	It is not clear from the Council's evidence base that there is any justification to support this policy, without rendering development for student accommodation unviable.	Viability testing for LP2045 indicates contributions from PBSA are viable.

H3	Objection - Unjustified	In line with previous comments to the withdrawn Local Plan, the Universities do not support this option given that student accommodation is already an affordable form of housing that relieves pressure on the University of Oxford and Oxford Brookes University wider housing market. The controls over location of student accommodation mean that there is limited competition with mainstream housing, which means this policy is unlikely to be justified.	Noted.
H3	Support for alternative option	A number of people said they preferred alternative option 1 rather than the Preferred Option. Comments in support of this include:	The reasons for the preferred option are set out in background paper 002.

Draft policy	Topic	Summary of comments	Response

		• the delivery of new sites should not be at the expense of housing for Oxford residents. Any funds raised could contribute towards buying back existing family housing currently used to house students. • Education establishments MUST make a greater contribution to Oxford than is presently the case. • All new developments of this kind should have a duty to contribute towards affordable housing given the need in Oxford, no matter the size of the development. • We recognise that students do not pay council tax, and in many cases there is also no CIL payable if the institution has charitable status exemption. We therefore believe that all purpose built student accommodation should make a financial contribution to housing by way of compensation. • All initiatives to fund further affordable housing should be pursued. • The draft plan itself states that many sites for student accommodation could equally be suitable for non-student homes. The plan also makes it clear that contributions will not be required from either proposals within existing or proposed university or college campus sites OR renovations of existing sites. i.e. they will only be required from units creating a net gain. Although the plan voices a concern in that “any contributions should not disadvantage the delivery of sites,” the delivery of new sites should not be at the expense of housing for Oxford residents. Any funds raised could contribute towards buying back existing family housing currently used to house students.	

Draft policy	Topic	Summary of comments	Response
H3	Support for alternative option	Prefer alternative option 3 because this might reduce the creation of social housing ghettos, by distributing social housing more evenly across neighbourhoods, and not creating "estates" with concentrations of social housing in only some neighbourhoods where more social housing concentration is accompanied by anti-social behaviour, drug dealing, fly-tipping, unkept rubbish strewn bins and gardens etc. It is better that student areas take some of the social housing load, as do all other areas, including affluent areas etc.	The reasons for the preferred option are set out in background paper 002.
H3	Support for alternative option	The Plan itself concedes that “any contributions should not disadvantage the delivery of sites,” and notes that on-site affordable units are seldom practical in PBSA. A more supply-led, proportionate approach would either (i) apply the contribution only to **larger schemes—say 50 rooms or more—**or (ii) forgo it altogether where the development demonstrably substitutes for private HMOs. By keeping the pipeline of student accommodation flowing, Oxford maximises both housing choice and affordability without relying on complex transfer payments that can inadvertently choke off the very supply the city needs.	The reasons for the preferred option are set out in background paper 002.

H3	Policy/ glossary wording misalignment	Exemption from contributions towards affordable housing provision welcomed for new student accommodation that is within an existing or proposed university or college campus site. This exemption must include the Centre for Islamic Studies sites on Marston Road (i.e., Government Buildings and Harcourt House) as development of student accommodation is integral to the development of academic and institutional facilities. Currently the glossary definition does not reflect the draft policy requirements. The draft policy suggests that existing and proposed	The sites referred to are in use as a car park and a small business estate/ cadet accommodation. If these sites come forward for development that meets the definition of ‘campus development’ that matches what they are allocated or proposed for, then they will be exempt from the policy. For clarity, the Glossary has been amended to say:

Draft policy	Topic	Summary of comments	Response
		campuses should be exempt from the requirement for financial contributions, while the glossary definition only includes existing campuses. The glossary should be updated to include proposed campuses, including the Centre’s allocated sites, to properly reflect policy H3 and avoid future confusion.	Campus: Accommodation occupied by an educational institution and comprising academic institutional uses including academic (teaching, seminar and lecturing spaces), research (laboratories and special facilities) and/or administrative uses (offices and administrative functions).

H3	Applicant specific text Modification/ amendment	At each and every Local Plan, Oxford City Council has tried, under pressure, to give existing Universities preferential treatment, each and every time the Inspector throws it out as a policy cannot be dependent on applicant identity. Remove applicant specific text, make effective	Draft Policy H3 only contains “applicant specific text” in relation to the locations/ circumstances where affordable housing contributions will not be sought from purpose-built student accommodation.
H3	Seeking exemption from contributions towards affordable housing	Lincoln College is promoting an existing College site for graduate accommodation - the site would not be suitable for market housing. Seeking confirmation (via pre-app advice) that contributions would not be required for affordable housing.	The glossary definition of ‘campus’ is: Accommodation occupied by an educational institution and comprising academic institutional uses including academic (teaching, seminar and lecturing spaces), research (laboratories and special

Draft policy	Topic	Summary of comments	Response

			facilities) and/or administrative uses (offices and administrative functions). The site being promoted is currently in use as sports provision, there is no existing accommodation and therefore contributions are likely to be required for affordable housing.
H3	General comment	As well as the locations listed in the policy, we support student accommodation being provided on arterial roads. These locations are generally sustainable for public transport and active travel, and these busier locations can be more suitable for young people than families. Students can also be very beneficial for local shops on arterial roads, as demonstrated by Iffley and Cowley Roads in East Oxford.	Draft Policy H10: Location of new student accommodation sets out where planning permission would be granted for student accommodation. The intention of the policy is to ensure a balance is struck between providing accommodation for students, but also for all other types of housing needed within the city. Allowing student accommodation along arterial routes has the potential to significantly change their character which could have a negative impact on the local community.

H3	General comments	This is an unwarranted tax on landlords and students. This is totally mixing up objectives and unnecessarily skewing aims and outcomes.	Securing contributions towards affordable housing from new purpose build student housing can contribute towards the supply of

Draft policy	Topic	Summary of comments	Response

		I assume the contribution is from the developer, not the students. I think the financial burden will fall ultimately on students. If you are proposing to do this then you are probably considering to provide too much affordable housing. Please don't do this! Just get on with building housing and don't slow things down with restrictions!! The need to take pressure off the ladder is the main thing. Fine tune in later years! Housing is a crisis the important thing is to make rapid progress! You should force the university/colleges to provide one accessible dwelling for every student accommodation room it builds. I think there is a balance that needs to be struck between student housing and other housing, both affordable and general housing requirement. This city, especially some parts of it, is in danger of being swamped with student housing, either new built or in existing stock (i.e. HMOs) The policy is unjustified as the economic gain or loss will be the same for existing or new campuses or institutions, further, provision of student housing of itself removes students from the housing market. Ineffective as student accommodation can be provided by nonuniversity institutions (Boarding schools, Language schools)	affordable homes as many sites for student accommodation could equally be suitable for non- student homes, from which a percentage of affordable housing would have been sought. The preferred option seeks to strike a balance between the accommodation needs of students and other types of housing. Payment liability would fall on the applicant/ developer.

Draft policy	Topic	Summary of comments	Response
		All of these screams are pushing prices up for the consumer, in this case the students, which already have difficulties paying back their loans. This is a problem created by a University that follows a blind 'growth is good' mantra, at whatever costs to the city. Student accommodation makes this place more soulless and is expensive, meaning that this further contributes to making oxford the most unfair place to live - is your future for oxford a place for the born wealthy, foreign investors and every street looking the same?	

H3	Higher thresholds required.	The current thresholds is insufficient, it should be less than the 10 unit or 25 room threshold as this creates a loop-hole for developers to build smaller developments on the remaining sites - which are by definition going to be small. The financial rate per room should be higher. We should not unfairly impose additional costs on developers building larger developments while not imposing them on smaller developments. Every new purpose-built student room pulls a student out of the private rental market, easing pressure on family homes and reducing overall rents. Policy H3's low threshold—financial contributions from schemes as small as 25 beds or ten self-contained units—risks slowing delivery of this dedicated stock, because the levy is set on a	The threshold is as same as that for residential developments.

Draft policy	Topic	Summary of comments	Response
		comparable basis to residential development and calculated against land value.	

H3	General Comment	Student developments should make contributions to local leisure and entertainment hubs. One problem with the city is there are only a couple of social focal points (Cowley road/Jerico). This is part of the traffic and transport problems, everyone is trying to get to the same place. New Student developments should create/seed those sort of hubs in new places.	The policy seeks contributions towards affordable housing as this can help contribute towards the supply of affordable homes in Oxford.
H3	General Comment	The student housing sector should play a stronger role in supporting affordable housing in the wider community.	Noted.
H3	Viability	In a city where suitable sites are scarce and landowners already face a menu of Section 106 and CIL costs, even a modest per-bed charge can tip marginal schemes into non-viability.	Viability testing for LP2045 indicates contributions from PBSA are viable.
H3	General Comment	The present situation has led to student accommodation being developed on a commercial basis because it is more profitable than other housing. 25 student rooms are enough to cause a significant impact on a neighbourhood and it is important that developments of this size are sensitively done and with proper management organised and not just put up wherever a developer can find a space. NB This policy should apply to university and college developments and not just commercial ones.	The policy does not apply to development within university campus sites or redevelopment of existing PBSA that is currently and will continue to be owned and/or managed by the universities. This is because development on those sites would not displace mainstream residential development or reduce opportunities for the provision of affordable housing.
Draft policy	Topic	Summary of comments	Response

H3	Support for alternate option	Why should student housing developments contribute to 'affordable housing'. Building student accommodation takes students out of other housing stock releasing it for general use. The whole concept of subsidised housing is unfair. If the city needs and the market can support student housing, let it built and do not tax it differently.	The reasons for the preferred option are set out in background paper 002.
H3	Support for alternate option	Students are on the lowest incomes in the city, requiring additional contributions to push up their rent is wrong. I favour option e.	The reasons for the preferred option are set out in background paper 002.
H3	Support for alternate option	Decent student accommodation is key to the city and should not be discouraged.	The reasons for the preferred option are set out in background paper 002.
H3	General comment	Prefer to seek a financial contribution from all student accommodation developments, but towards social rent housing rather than "affordable".	The reasons for the preferred option are set out in background paper 002.

Statutory Consultee Responses – Draft Policy H3

Oxfordshire County Council

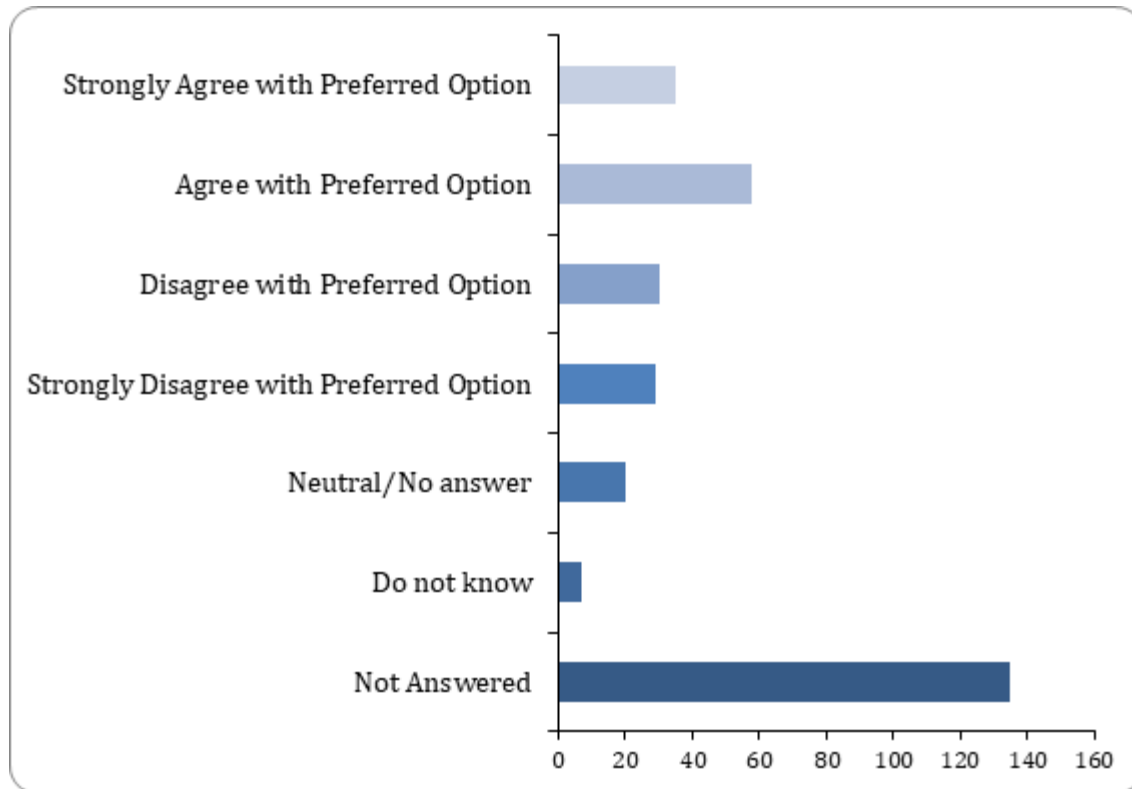
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy H3 AH financial	Strategic Planning	Noted.	No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
contributions – student acc.	This is a matter for the City Council. We agree with the preferred option to seek funding for affordable housing to be delivered on other sites.		

All Public Responses – Draft Policy H4

Please tell us what you think about policy options set 002c (draft policy H4): Affordable housing: financial contributions from self-contained older-persons accommodation.

There were 179 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	35	11.15%
Agree with Preferred Option	58	18.47%
Disagree with Preferred Option	30	9.55%
Strongly Disagree with Preferred Option	29	9.24%
Neutral/No answer	20	6.37%
Do not know	7	2.23%
Not Answered	135	42.99%

Draft policy	Topic	Summary of comments	Response
H4	Comments in support of policy	As most older-person accommodation development is going to be increasingly by commercial entities they too must contribute more to Oxford. Ambivalent between preferred option and alternative 1.	Support noted.

H4	Alternative options	Several comments support alternative option 1 – i.e.: • housing developments for old people shouldn't be approved with free rein for profit only- they must contribute to society. The only exception to this should be if the development is converting disused or derelict buildings or brownfield sites, • Having a threshold of more than 10 self-contained units creates a loop-hole for developers to build smaller developments on the remaining sites - which are by definition going to be small, All new developments of this kind should have a duty to contribute towards affordable housing given the need in Oxford, no matter the size of the development. • Agree with Option 1 or a lower limit for the preferred option, the same as for student housing. • We should not unfairly impose additional costs on developers building larger developments while not imposing them on smaller developments. • All affordable and all financially contributing Some comments were in support of alternative option 2 – i.e. • Every new unit of specialist older-persons housing allows a household to “right-size”, releasing larger dwellings back to the general market and easing city-wide affordability	The reasons for the preferred option are set out in background paper 002. The policy seeks to strike the right balance.

Draft policy	Topic	Summary of comments	Response

		pressures. Oxford faces a need for roughly 1,100 extra-care and supported units by 2042, yet suitable sites are scarce and typically small. Imposing an affordable-housing levy on schemes of just 10 self-contained units—the draft H4 threshold —risks deterring precisely the modest, infill developments that can be delivered quickly within the city boundary. • The Plan acknowledges that on-site provision is usually inappropriate for retirement complexes and that viability testing must not “disadvantage the delivery of sites”. In a highcost land market, even a well-intentioned payment-in-lieu can erode residual land value to the point where owners hold rather than redevelop. The result would be fewer specialist units, slower turnover of under-occupied family homes, and greater pressure on adult-social-care budgets. A calibrated, supply-led policy would therefore: Apply the contribution only to larger schemes (≥ 20 units) where economies of scale exist, or waive it where a proposal demonstrably frees generalmarket housing. • By raising the threshold, Oxford would secure more specialist accommodation and, indirectly, more family housing— advancing both affordability and welfare without constraining vital supply (only levy contributions on schemes of 20 + units) Comments in support of alternative option 3: • This option might reduce the creation of social housing ghettos, by distributing social housing more evenly across neighbourhoods, and not creating "estates" with	

		concentrations of social housing in only some neighbourhoods.	

Draft policy	Topic	Summary of comments	Response
		• It is better that older person areas take some of the social housing load, as do all other areas, including affluent areas etc. Others preferred alternative option 4 commenting as follows: • Don't discourage accommodation for the elderly from being built. • Bespoke accommodation for the elderly makes it easier for people to downsize, freeing up houses elsewhere. • There should be no requirement for contributions from older persons accommodation. Such accommodation at reasonable cost would encourage older people to downsize and so release family sized housing which is badly needed. At present there is very little housing for older people in Oxford suitable for people who do not need or wish to move into a care home. • This type of development needs to be encouraged and could free up housing stock.	

H4	General Comments	Self-contained older-persons accommodation will increasingly be necessary - this isn't a money-making enterprise (unlike student accommodation) - and the low-paid people who work at them will need to live somewhere close too. Affordable housing should accompany self-contained older-persons accommodation, but not to the point at which no developers can afford to build self-contained older-persons accommodation. I would prefer specifying seeking contributions from private and forprofit older-persons developments.	The policy allows for a pro rata approach to determine the level of contributions for mixed use developments. Contributions are not being sought for developments of less than 10 self contained units.

Draft policy	Topic	Summary of comments	Response

		This is totally mixing up objectives and unnecessarily skewing aims and outcomes. Keep the formula transparent and subject to viability review, avoiding ad-hoc negotiations that add delay. Prioritise rapid delivery of age-appropriate homes—through gentle density and mid-rise formats—as the most effective, market-driven path to affordability city-wide. Let the market decide the cost of housing and what should be built, not interventionist policies to benefit preferred groups. If the city needs units for the elderly then let it get built without extra penalty. Old people on pensions are often on fixed incomes. Rental prices are already so expensive in oxford. Affordable housing needs a rethink before you start claiming money from everyone for it. Again a hidden tax on people who want to retire. Another unwarranted tax.	
H4	General Comment	The preferred option appears to penalise older retired people rather than the developers - the main one being the University - who are pushing for constant growth and profit at whatever costs to residents. Their fixation on growing the University and providing profitable	Payment liability would fall on the applicant/ developer.

Draft policy	Topic	Summary of comments	Response
		accommodation for students is why there is pressure on housing/places for older people.	
H4	General comment	Prefer to seek a financial contribution from all self-contained older persons accommodation developments, but towards social rent housing rather than "affordable".	The reasons for the preferred option are set out in background paper 002. The policy seeks to strike the right balance.

Statutory Consultee Responses – Draft Policy H4

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

1901

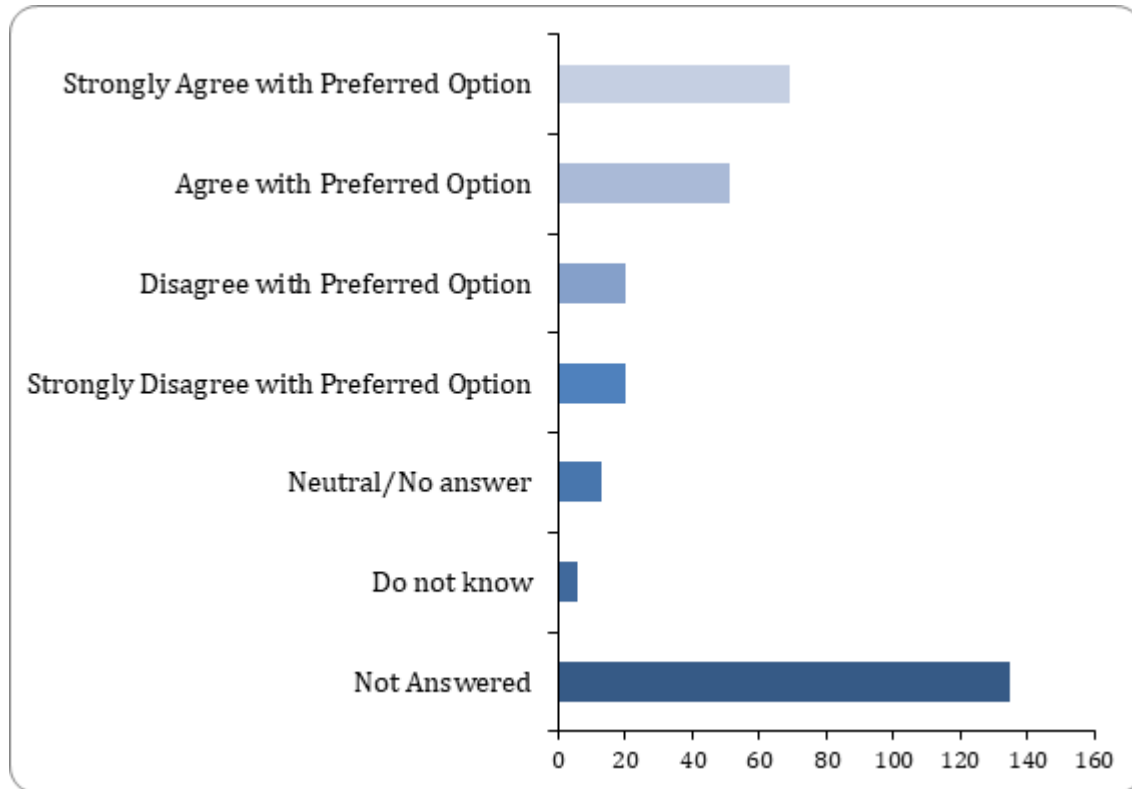
Policy H4 AH contributions from selfcontained older persons acc.	Strategic Planning and Infrastructure teams In order to deliver affordable extra care housing units, generally a minimum of 60 units are needed for a scheme to be viable. Therefore, if the requirement for affordable housing is 40%, we would agree that unless a total of 150 units are proposed, it may be difficult to separate off an affordable element of extra care housing.	Noted.	No Action Required
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

	Nothing in text that specifically ring-fences contributions from older persons housing to deliver affordable extra care accommodation. It appears that the contributions gained from affordable housing on self-contained older persons housing will, like other contributions, go into a pot for affordable housing generally. The County Council would like to see some provision being made within the affordable housing pot for extra care housing for older people and specialist needs. This may not need to be addressed by any change of policy in the Local Plan, but instead by a working arrangement, perhaps addressed through a memorandum of understanding. The contributions could be pooled into a pot for future supported housing projects.	That is correct. There is no specific ring-fencing of contributions for affordable extra care housing. We will continue a dialogue with the County Council on this issue, which could be addressed outside of the plan-making process.	No Action Required No immediate action required related to the plan-production process however further discussions with county colleagues may be required in the future.

All Public Responses – Draft Policy H5

Please tell us what you think about policy options set 002d (draft policy H5): Affordable housing: financial contributions from new commercial development.

There were 179 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	69	21.97%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	20	6.37%
Neutral/No answer	13	4.14%
Do not know	6	1.91%
Not Answered	135	42.99%

Draft policy	Topic	Summary of comments	Response
H5	Lack of evidence base	No clear evidence has been provided showing a causal link between commercial floorspace and additional affordable housing need. No analysis has been undertaken that relates to job creation by use class, the share of workers needing housing locally, or the portion of need attributable to individual schemes. The policy also lacks clarity on key matters, such as the calculation methodology.	The calculation is set out in the Draft Submission Oxford Local Plan. Employees are people and people need to live in homes, and there is a significant need for affordable housing in Oxford, so the policy approach is considered justified.

H5	Support option c	Multiple responses from developers support option c. Requiring contributions would harm commercial investment in Oxford. A similar policy to option a) was tested and found unviable between 20012016. It is unhelpful that there is no up-to-date viability assessment in support the proposed policy. Seeking a contribution would not meet all three tests for planning obligations set out under Paragraph 58 of the NPPF as the obligation is not necessary to make commercial developments acceptable in planning terms and not directly related to the development. The current market cannot absorb the additional costs, especially after a recent large increase in commercial property charges (CIL) ie. a 400% increase in the levy charges for Class E, B2 and B8 uses. Regarding option a), major commercial developments already deliver significant financial contributions towards delivery of infrastructure, highways improvements and public transport improvements, including towards the delivery of the Cowley Branch Line. Regarding option a) and b), OCC have not undertaken and/or published a viability assessment at this stage. OCC should ensure that the viability assessment contains careful analysis on development at Botley Road	The viability assessment shows this approach is viable. The 2036 Plan did not include this approach as it was no longer viable. The viability profile has changed considerably. The Draft Policy is very clear that this requirement applies only to new developments.

Draft policy	Topic	Summary of comments	Response

		Retail Park, Osney Mead and other commercial developments coming forward. In the absence of additional supporting text and draft policy wording for option b, there are also concerns over contributions being applied more than once to the same site and development. Should such a policy be adopted (either in the case of Option A or Option B), safeguards would need to be put in place in the policy and supporting text, limiting its application to new developments only. The policy should be clear in stating that it is not applicable to: (i) any subsequent changes of use applications between the employment land use classes; or in relation to (ii) any applications relating to alterations or extensions to the new buildings. Without these safeguards in place, the viability of maintaining and improving existing employment buildings for future use will be called into question, particularly during downturns in the economy.	
H5	Support option c- reduced chance social housing ghettos	Anti-social behaviour problems partially caused by an overconcentration of social housing would be reduced- better that commercial areas take some of the social housing load.	Comment noted.
H5	Small sites too	Unfair to impose additional costs on developers buildings larger developments, but not smaller ones.	The threshold is consistent with national guidance on when these contributions are required.
H5	Support option b, expressing concern about option a	Multiple responses support option b but emphasise that this is without seeing a viability assessment. Carefully consider the impact on local and national economy, particularly key employment and revenue generating sectors such as life sciences, research and innovation. These sectors are critical to the city's long	The viability assessment fully reflects other needs and requirements such as contributions to the Cowley Branchline and the update CIL Charging Schedule. The

		term economic resilience and global competitiveness. For instance, the risk of making	
Draft policy	Topic	Summary of comments	Response
		investment in the Oxford Knowledge Cluster unattractive compared to other locations where such levies are not in force. Impact on OUH. The commercial success of these sectors is steadfastly in the national interest and central to government policy as set out within the Government's 'Plan for Change' and incorporated in to key national policy within the 'Modern Industrial Strategy' (June 2025) and 'National Planning Policy Framework' (December 2024). Closer to home, undermining the commercial viability of development risks the delivery of the significant infrastructure needs, such as the Cowley Branch Line. Brining housing to employment sites brings activity at otherwise quiet times.	contributions are set at a level that is well within what is assessed to be viable, keeping in mind all costs and other requirements.
H5	Support for option a (preferred option)	All employment sites require workers, and a proportion of them will require affordable housing. These sites generate significant profits and drive up land values, reducing available space for the community, so they should contribute to addressing the housing crisis by contributing to the cost of providing affordable housing.	Support welcomed.

Statutory Consultee Responses – Draft Policy H5

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy H5	Strategic Planning	Noted.	No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

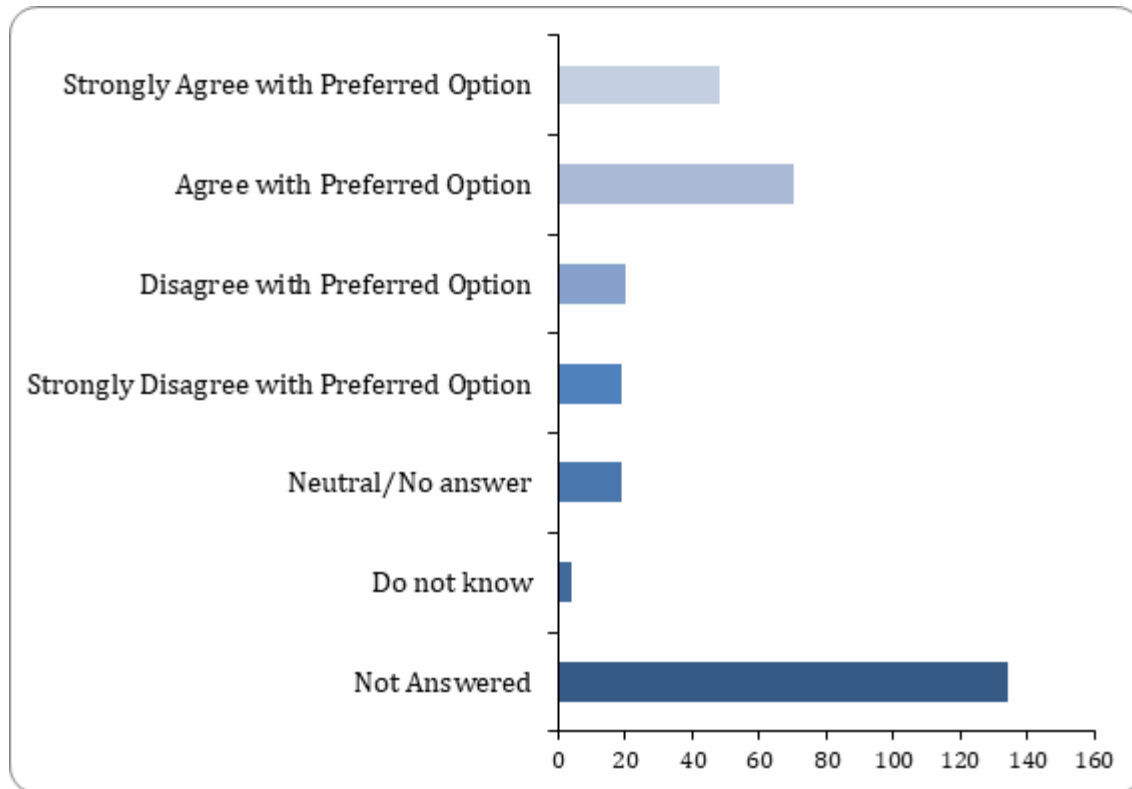
AH: financial contributions from new commercial development	This is a matter for the City Council. We agree with the preferred option to seek financial contributions from new commercial development subject to further viability studies which could assist meeting the need for affordable housing.		
	It is understood (and important) that this affordable housing contribution will be in addition to s106, CIL and Cowley Branch Line contributions (as needed).	The viability testing makes assumptions for S106, CBL contributions (as needed) and CIL.	No Action Required
	The County Council would like to highlight the importance that this requirement does not jeopardise the delivery of sites which can contribute to necessary infrastructure, in particular related to the Cowley Branch Line.	The viability testing makes assumptions for CBL contributions.	No Action Required
	Minerals and Waste Policy and Strategy Commercial developments to which the policy applies should be defined in the glossary.	The policy will need to set out which developments it applies.	Oxford City Action: set out development
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

			types to which the policy applies

All Public Responses – Draft Policy H6

Please tell us what you think about policy options set 002e (draft policy H6): Employer-linked affordable housing.

There were 180 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	48	15.29%
Agree with Preferred Option	70	22.29%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	19	6.05%
Neutral/No answer	19	6.05%
Do not know	4	1.27%
Not Answered	134	42.68%

Draft policy	Topic	Summary of comments	Response
H6	Support for policy	Multiple comments express support for the policy as it aligns with the definition of Affordable Housing in the NPPF that identifies that homes “for essential local workers” can be considered as part of any requirement.	Support welcomed.
H6	Add site 024 into policy (Government Buildings and Harcourt House)	Consider that specific reference should be made to site 024 (Government Buildings and Harcourt House) within policy H6. Rationale is set out below: The Centre has a need and duty to provide affordable housing for its permanent staff working in the teaching, administration or other essential, on-site support services. The city’s restricted housing market and extremely high house prices make it very difficult to recruit and retain essential staff. The same is true for early career academics who are forced to turn down positions because they cannot afford Oxford rents. This problem must be addressed if the city is to attract the brightest and best, without whom it will be difficult to hold on to its reputation as a world leader in scholarship, which in turn impacts the surrounding economy.	Policy H4 in the draft Regulation 19 Plan indicates that the sites identified as appropriate for employer-linked affordable housing includes “Campus sites of the colleges of the University of Oxford and of Oxford Brookes University. These are sites with academic accommodation existing at the time of the adoption of the Local Plan, and where academic institutional use would remain on the site, even with the development of some employerlinked housing”.

H6	The main employer in the city should deliver new homes for their staff or provide significant contributions to	Ever increasing expansion of the main employers – Oxford University, OUHT and Brookes, BMW, are the root cause of housing need in the city. The Headington hospitals (e.g., JR, Churchill and NOC) have capacity for 1000s of homes in highly sustainable locations, by developing existing car parks for new homes would reduce the need to travel and save the surrounding countryside and the few remaining green spaces in the city. Either employers in the city should provide	Policy H3 in the Draft Submission Oxford Local Plan is aimed at helping address the housing need created from new employment. Policy H4 enables employers, in certain circumstances, to provide for their own staff.

Draft policy	Topic	Summary of comments	Response
	housing delivery in the city	housing or pay significant contributions towards new homes based on their increasing staff numbers. They cannot simply create housing need, traffic problems and dump the consequences onto the taxpayer and ordinary citizen. The policy is too complex and restrictive. Better solutions such as allowing market housing or straight sale of land would provide more homes.	
	Proposed Modification	Mandatory contributions to housing with discounts where on-site housing is provided, and further discounts where destination parking space is used. Allow market component as incentive to delivery. General housing should be allowed. A contribution to housing stock is valuable however it is delivered and should be determined by the landowner. Sites should not be listed as this is not effective as the list given is not the same as the Site Policies, Headington Hall and Ruskin are both absent.	

H6	No justification for policy	We are concerned that Criterion (f) requires an unspecified and potentially unjustified level of control and approval over the employer's affordable housing approach. We accept that the controls identified in criteria a) to e) should be controlled through a legal agreement, however we consider that criteria f i) to f iii) exert an unacceptable and unworkable degree of control over assets which are not in the control of the City Council. We therefore request that the policy is modified to read as follows: " f) A legal agreement will be required to secure the benefits of this policy. ~~In addition, the legal agreement will be used to: i) agree the allocations policy; ii) agree an appropriate re-letting of units in the property in the event that there are units vacant for more than 6 months; iii) agree that if the employer decides they no longer have a~~	The legal agreement to secure the affordable housing policy as negotiated with the applicant is considered a reasonable approach, necessary to ensure the benefits are realised.
Draft policy	Topic	Summary of comments	Response
		need for the housing, then the affordable housing requirements detailed under Policy H2 will be applied. "	

Statutory Consultee Responses – Draft Policy H6

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy H6 Employer-linked AH	Strategic Planning and Infrastructure team		
	The County Council has published a draft Adult Social Care Workforce Strategy, which outlines higher than national average housing costs within Oxfordshire as an obstacle to the recruitment and retention of social care professionals. We welcome the recognition in Policy H6 and some site policies of the need for employer-linked affordable housing to provide homes for key workers. We can provide further advice if needed about the ongoing need for key workers undertaking multiple social care roles.	Noted. Noted.	No action required. No action required

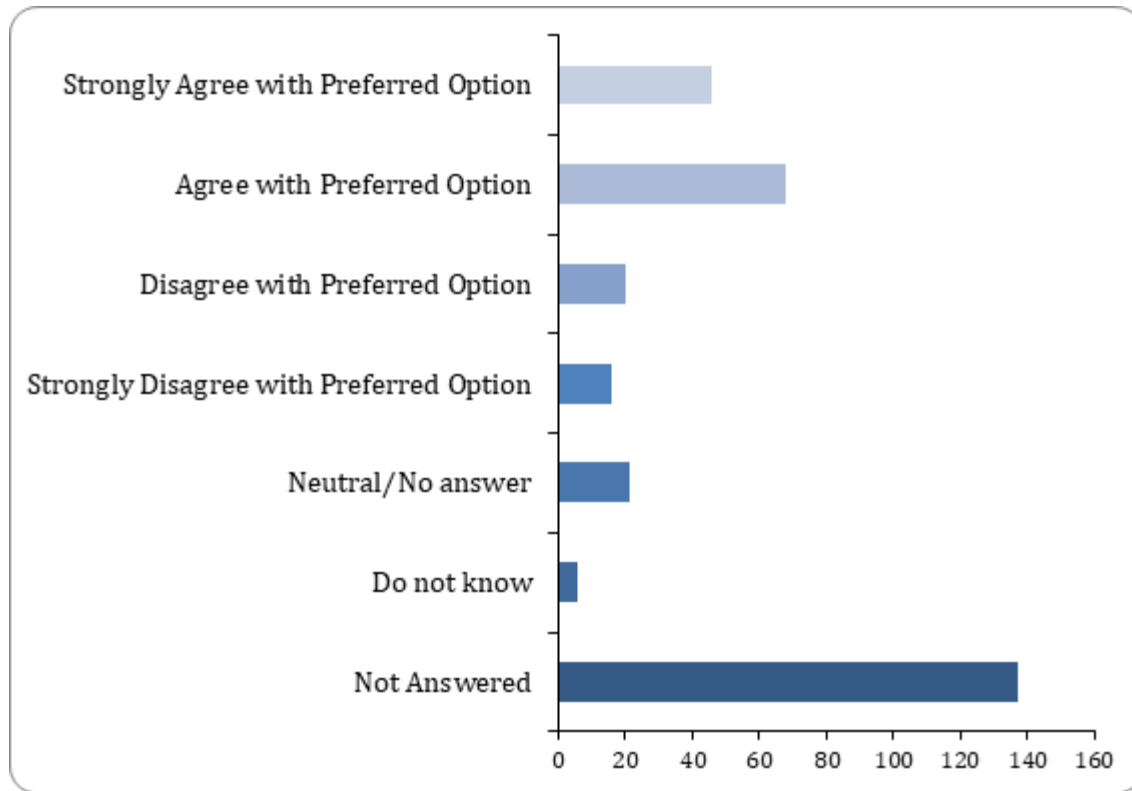
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

	It is noted that the third paragraph of this policy reads: “Where this policy is applied, the standard affordable housing requirements of Policy H2 will not apply, except to any market housing element on the site, or under those circumstances identified under criterion h).” however there is no criterion h) either under Policy H2 of H6.	We will review the policy and make sure that internal references are correct.	Oxford City Action: Ensure that policy criteria are correct and correctly referenced

All Public Responses – Draft Policy H7

Please tell us what you think about policy options set 001b (draft policy H7): Mix of dwelling sizes (number of bedrooms).

There were 177 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	68	21.66%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	21	6.69%
Do not know	6	1.91%
Not Answered	137	43.63%

Draft policy	Topic	Summary of comments	Response
H7	Application to BTR	The Council could usefully clarify whether the Mix of Dwelling Sizes (Policy H7) applies to Build to Rent (BTR). It is very uncommon for BTR to accommodate 4-bedroom units as the Council's evidence base recognises.	H7 allows flexibility for proposals to respond to site context and local needs, as well as market demand and design considerations. The prescribed housing mix only applies to the affordable element, and there is flexibility in the policy if it can be shown as not feasible on a specific site.
H7	Policy should specify space standards as well as housing mix	CPRE are supportive of the mix of dwellings but are concerned that on recent housing developments the social rent / affordable element is mostly made up of one or two bedroomed flats often located in blocks adjacent to main roads. Since the lack of housing for those in need is one of the main drivers for allowing development in the first place a minimum floor area should be set for the social/ affordable element as a condition for planning permission rather than only the number of units.	We will continue to apply the Nationally Described Space Standards to new residential development, including for the affordable element. This policy outlines minimum floor areas for different dwelling types and occupancies.

H7	All staff housing schemes should be exempt	The preferred option for Policy H7 sets out a prescribed housing mix, which proposals for 25+ homes, or sites of 0.5ha+ are expected to comply with, unless it can be shown not to be feasible. Employerlinked affordable housing is exempt from this requirement; however, it is considered that all staff housing schemes should also be exempt on the basis that they are likely to have their own bespoke housing requirements. Contrary to wider ambitions within the plan for making efficient use of land, requiring all schemes to comply with the prescribed housing mix may also preclude higher density developments, in locations where they may otherwise be appropriate.	H7 allows flexibility for proposals to respond to site context and local needs, as well as market demand and design considerations. The prescribed housing mix only applies to the affordable element, and there is flexibility in the policy if it can be shown as not feasible on a specific site.

Draft policy	Topic	Summary of comments	Response
H7	New policy: extensions	Many houses in Oxford are getting extensions, suggesting that houses are too small in general. Houses should be built to easily have one or two bedrooms added in a logical place. This would keep the initial price down and allow affordable extensions in the future.	National policy/permitted development rights already allow for modest household extensions without planning permission.
H7	Fuelling overpopulation (climate considerations)	The rationale behind offering 5-bedroom affordable homes should be clarified due to overpopulation and climate mitigation.	The housing mix is informed by the assessment of housing need in Oxford.

H7	Questioning the 10 units threshold	10 units is too small (they support a more flexible policy). Another comment wants it to be lowered to 5 units because most developments in their neighbourhood (Summertown) are less than 10 which they don't want to encourage.	10 units was chosen because that is the definition of major development. A higher threshold for example with a 25-unit threshold, would be more likely to fail to meet identified needs and could lead to an imbalance in housing mix. Alternatively, a lower threshold would be too small to get a mix onsite.
H7	Lack of clarity	Several comments say policy wording could be clearer e.g. it is unclear if a one-bedroom apartment would be a "home" or not. One person says confusing wording has stopped them from giving input.	Any self-contained residential dwelling is classed as a home. Noted, further explanation is provided in the supporting text and background papers.
H7	Support for preferred option	Several people support the policy, saying that diversity is needed in developments e.g. to avoid areas where no one with small children can move in which could be detrimental for local schools. Some support with no stated reason.	Noted and appreciated.

Draft policy	Topic	Summary of comments	Response

H7	Alternative options	Several comments support option b, i.e. including a mix for both market and affordable homes, with no stated reason. Many comments support option c, i.e. not specifying a mix for any type of development but requiring 2-3 types of unit size in larger developments. They argue this would allow developers to better respond to market signals. Several comments against any policy relating to housing mix, either with no stated reason, or for reasons such thinking we should not interfere with the housing market as it will disincentivise developers.	Including both market and affordable homes would not allow for a flexible response to the market. Sites that are best delivered as flats, for example, may not come forward at all if there is a lack of market interest in 3-bedroom flats, for example. Not specifying a mix is more likely to fail to meet identified needs and lead to an imbalance in sizes of new units of both market and affordable housing. The absence of a policy on housing mix is likely to result in not having the optimum housing mix being delivered for the city. For example, one-bed flats are the smallest and cheapest to build and delivery would be likely to heavily skew towards these.
H7	Only prescribe a mix for affordable homes	Newmark consider the current policy contradicts itself as it starts by only relating to AH, but it later implies a mix would be set for both AH and market homes.	The respondent has misinterpreted the draft policy which does in fact only apply to

Draft policy	Topic	Summary of comments	Response
		We consider a unit mix should only be prescribed for the AH.	affordable housing (not market housing). The first part applies to affordable housing (for rent or ownership), and the second part only applies to affordable ownership.
H7	More council housing and housing cooperatives	One person does not support any of the policy options as they argue that there is an overreliance on market housing: there should be more council homes and housing cooperatives instead.	There are other policies in the Local Plan which seek to deliver social rent housing and community-led development (H2 and H13).

Statutory Consultee Responses – Draft Policy H7

Oxfordshire County Council

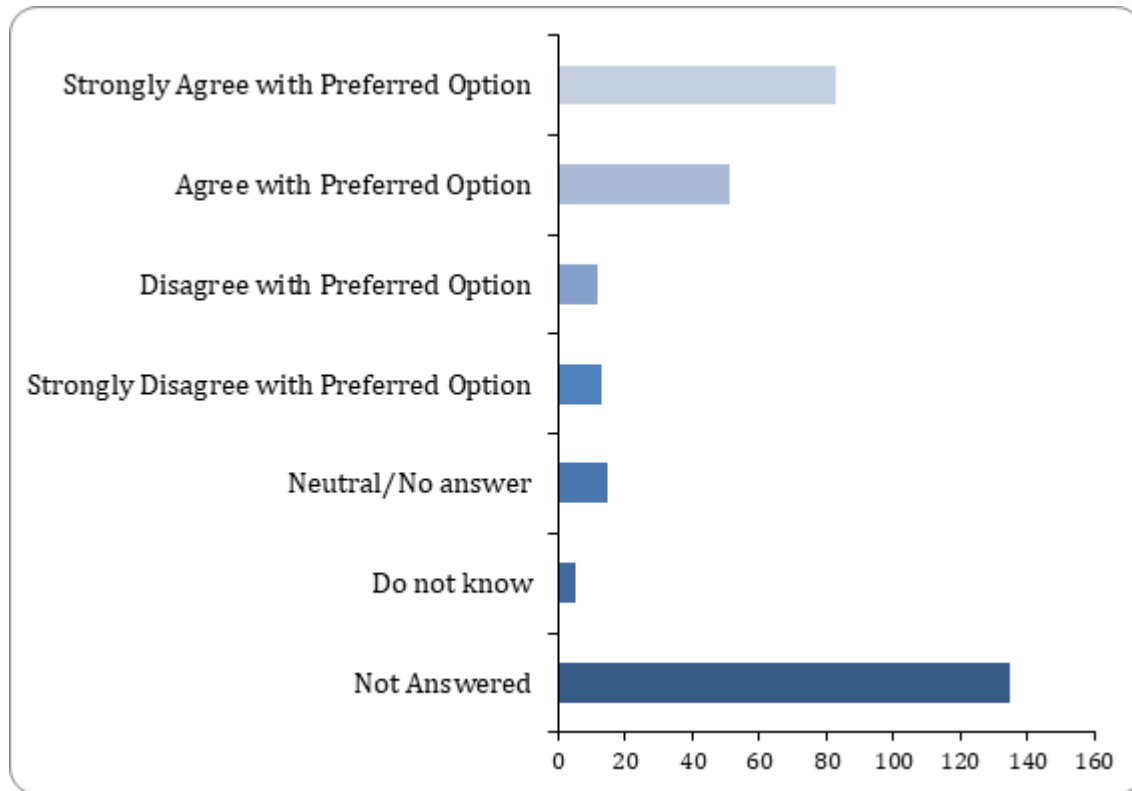
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy H7 Mix of Dwellings	Strategic Planning This is a matter for the City Council. The City's choice between the options on mix of housing sizes should be based on the evidence and monitoring of current policy.	Noted.	No action required.
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	Housing Services This policy sets out the number of bedrooms, but this may not be sufficient to ensure an appropriate mix of dwellings to create mixed and balanced communities. Given that extra care housing developments within Oxford City are unlikely, we consider there is a need for provision within the policy that refers to the possibility of providing affordable specialist supported housing.	This comment is contrary to the above. We are not considering introducing a provision relating to affordable specialist supported housing for this policy.	No action required. May be discussion outside plan-making are needed.

All Public Responses – Draft Policy H8

Please tell us what you think about policy options set 001c (draft policy H8): Loss of dwellings.

There were 179 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	83	26.43%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	12	3.82%
Strongly Disagree with Preferred Option	13	4.14%
Neutral/No answer	15	4.78%
Do not know	5	1.59%
Not Answered	135	42.99%

Draft policy	Topic	Summary of comments	Response
H8	Short lets	As worded this does not explicitly cover the loss of a permanent home to a short term let or holiday home. This should be clarified in the policy, or put in a separate policy. Policy should also include permanent residency requirements on all new housing granted planning permission and restrict the number of short-term lets.	It's beyond the scope of the plan to restrict lets.
H8	Support	Support this policy and the contribution it will make towards retaining the existing housing stock.	The support is welcomed
H8	Subdivision is positive	Subdivision increases housing options, so this policy makes no sense. Can create flats for young, who need them. The policy should not include the blanket presumption against subdivision of existing family houses. There is an over-whelming need for single person housing and some family accommodation converted to this is beneficial.	The policy does not prevent subdivision at all, as long as the dwellings created meet space and other amenity standards.
H8	Subdivision should be restricted	This is a quick earner for a developer cashing in on short supply of first time housing and just generates problems for families trying to find a bigger place.	The mix of dwellings policy for new developments, as well as the market and practicalities will work together to ensure family units are still available.
H8	Object in principle	There should be no restrictions on the loss of dwellings. Let free market dynamics prevail.	Given the strong need for new housing, allowing loss would not be a good response.

H8	Strength of exceptions	Will these be strong enough? Will they be worked around by powerful vested interests?	The criteria set out only a few exceptions, which are considered sensible exceptions that will not be easily worked around.
H8	Include CLTs	This policy should include the encouragement of community land trusts.	This isn't something prevented by the policy.
H8	No mention of vacant properties	This policy is ineffective as it does not cover abandoned or vacant properties. (or a policy is missing)	Separate workstreams look at this issue, but it is not something that
Draft policy	Topic	Summary of comments	Response
			can be addressed by the planning system.

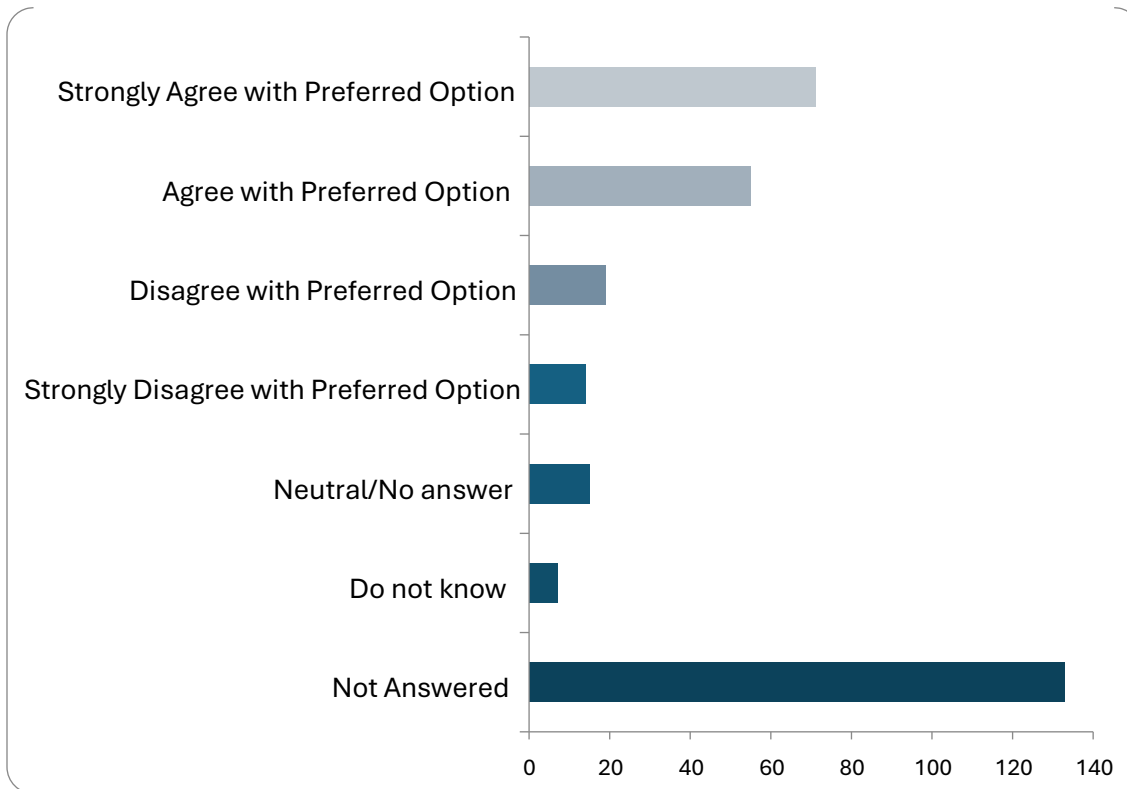
Statutory Consultee Responses – Draft Policy H8

There were no statutory consultee responses to draft policy H8.

All Public Responses – Draft Policy H9

Please tell us what you think about policy options set 003a (draft policy H9): Houses of Multiple Occupation (HMO).

There were 181 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	71	22.61%
Agree with Preferred Option	55	17.52%
Disagree with Preferred Option	19	6.05%
Strongly Disagree with Preferred Option	14	4.46%
Neutral/No answer	15	4.78%
Do not know	7	2.23%
Not Answered	133	42.36%

Draft policy	Topic	Summary of comments	Response
H9	Request for added flexibility	We consider HMOs offer an affordable solution for some individuals as opposed to renting individually or buying a property. We do however recognise that high concentrations of HMOs can result in changes to the character of the local area and can contribute to amenity issues and parking issues. However, we consider criterion a) (relating to the proportion of HMOs in a 100-metre street length) should not apply to the [Oxford Health NHS Foundation] Trust's sites. The Trust requires complete flexibility to provide staff accommodation on its sites and its considered that criterion a) as currently drafted could unacceptably limit the supply of new HMO accommodation on the Trust's sites. We therefore request that an exclusion is incorporated to Criterion a) to clarify that it applies to public streets rather than those within a privately owned estate, such as those owned by the Trust.	Comments acknowledged. An addition has been made to Appendix 2.2 (point vi) to make it clear that criterion a does not apply to roads within private nonresidential sites.

H9	Objection to policy	We understand the Council's definition 'new purpose-built HMO' means the same thing as 'co-living' accommodation or 'purpose-built shared living' accommodation. We do not agree that prohibiting this type of development is the right approach. The provision of purpose-built co-living allows for existing family homes, which have been poorly converted and are being used as HMOs (whether by students or house-sharing young professionals), to be freed up. Furthermore, the planning system can ensure that newly built co-living accommodation can be controlled and managed properly, which is not always the case with HMOs owned by individual landlords, and often managed poorly.	New purpose-built HMO could potentially have negative impacts leading to additional harm to local amenity, the character of a neighbourhood or additional demand on local services. They could also be put forward with the intention that they will house students and act like student accommodation to circumvent draft policy H8 which seeks to ensure student accommodation is delivered only in the most suitable areas. The preferred option is

Draft policy	Topic	Summary of comments	Response
			therefore to not permit this type of development.

H9	Limit for proportion of HMOs too high	We believe the proposed limit of 20% on the proportion of HMOs among dwellings within 100 metres of a new HMO is too high, and should be reduced to 10%.	Whilst reducing the threshold could lead to a reduction of HMOs in certain areas it is recognised that HMO offer the only available and affordable solution to many. Existing Local Plan Policy H6 includes a 20% threshold, and it is considered appropriate for this to be taken forward in the new local plan.
H9	“Unrelated individuals’ not defined	The phrase “Unrelated individuals” is not explained or defined. Does this mean a family with two unconnected students must now be classified as an HMO? This would be ineffective as it would have a negative effect on student housing provision, discouraging families from renting bedrooms.	An owner occupier can have up to 2 lodgers living in the property, for the purposes of the Housing Act 2004, the property would not be considered an HMO. Owner occupier includes the registered owner and any member of their household. Any subletting in a rented family home where there are 3 or more people from 2 or more households would likely result in an HMO being formed.

Draft policy	Topic	Summary of comments	Response

			In most cases, summer school students who are hosted by a family are unlikely to be deemed as occupying the property as their main or only home, they are essentially guests. Further guidance is provided in Appendix 2.2 of the draft plan which states that buildings NOT counted as HMO include a homeowner together with up to two lodgers.
H9	General comment	How is "area" to be defined? is radius the distance from an existing HMO?	Appendix 2.2 illustrates how the policy will be applied.
H9	Support for alternate options	A number of people said they preferred alternative options. Comments include: • why is the threshold currently 20%? What are the considerations? • Oxford HMOs are already restrictive, we should not restrict them further. • HMOs fill an important gap in Oxford's rental market, offering lower entry rents when studio flats are beyond reach. The policy as drafted would cap HMOs at 20% of properties within 100m and rule out any new purpose-built schemes. Such tight micro-thresholds dampen supply, push sharing households into adjoining districts and risk an unlicensed "shadow" HMO	The reasons for choosing the preferred option are set out in BGP 003: Specialist housing. The 20% threshold is in the existing adopted policy and is effective.

Draft policy	Topic	Summary of comments	Response
		market—outcomes that neither improve neighbourhood character nor housing affordability. •	
H9	General comment	Will anything be done where HMO are already over the 20%?	How the policy will be applied is set out in Appendix 2.2.
H9	General comment	Call a halt to planning permission being given in advance or retrospectively for HMOs. There are too many, and the residential character of areas with them - eg the Lye Valley estate - is being undermined.	Applications are determined in accordance with existing Local Plan policy H6.
H9	General comment	There should be no increase in the current percentage limit on HMOs as this is important in limiting the creation of new HMOs in areas that already exceed the limit. Consideration should also be given to reducing the proportion of HMOs in areas where limits are already exceeded and tackling associated legacy issues such as parking pressures. Conversion to short term lets, which aggravates local housing shortages, should be prevented.	There is currently no planning law to allow councils to restrict numbers and location of short term lets.

H9	General comment	There should be a better register of HMO (for some fly very much under the radar), and if planning permission was given for two family dwellings which turned out to be built as HMOs (or used as AirBandB rental) these should be retrospectively have their permission withdrawn.	Oxford City Council is required under the Housing Act 2004 to maintain a register of current HMO licences, temporary exemptions from HMO licensing and interim management orders. The Regulations only permit publication of licences that are in force and so prohibit publication of pending or expired licences.

Draft policy	Topic	Summary of comments	Response
H9	General Comment	HMOs can blight an area as there may be poor management leading to nuisance of all type for the neighbours. They also cause a loss of community cohesion when a family home becomes an HMO. This is one reason why the concentration of HMOs should be resisted. HMOs run by colleges and universities should be included in the policy. Although they may (but are not always) be better managed than commercial HMOs their effect on the local community will be equally damaging.	The policy seeks to strike a balance, it does not include HMO run by universities and colleges as policy H8 seeks to ensure that student accommodation is delivered only in the most suitable areas.
H9	General comment	I have spent half my life in Oxford in HMOs, it's an essential to the city and allowing early careers people to move here. Me feeling is the quantity and quality is controlled by supply and demand.	Noted.

H9	Lack of clarity	Consideration should be given to the increase in very large HMOs or clustering of several HMOs in a single building. It is not clear that the preferred option would deal with additional problems which they cause and the policy needs adjusting to ensure that it will do so.	The policy includes a requirement for applications for HMO to comply with good practice guidance on HMO amenities and facilities. Further adjustments are not considered necessary.
H9	General comment	You need a mixture of owner-occupied, private rental and HMO rental in an area or it'll just look shabby and feel dangerous. Take Ridgefield Road and Cricket Road, for example - the houses on these roads should be as desirable as any other 30s-built houses in Cowley but I wouldn't walk down either of these roads after dark (put it that way). Any harsh restrictions on HMOs just lead to unauthorised HMOs and bad conditions/poverty/crime etc.	The policy seeks to strike a balance between restricting the location of HMOs and allowing them to be part of a mixed and balanced community.

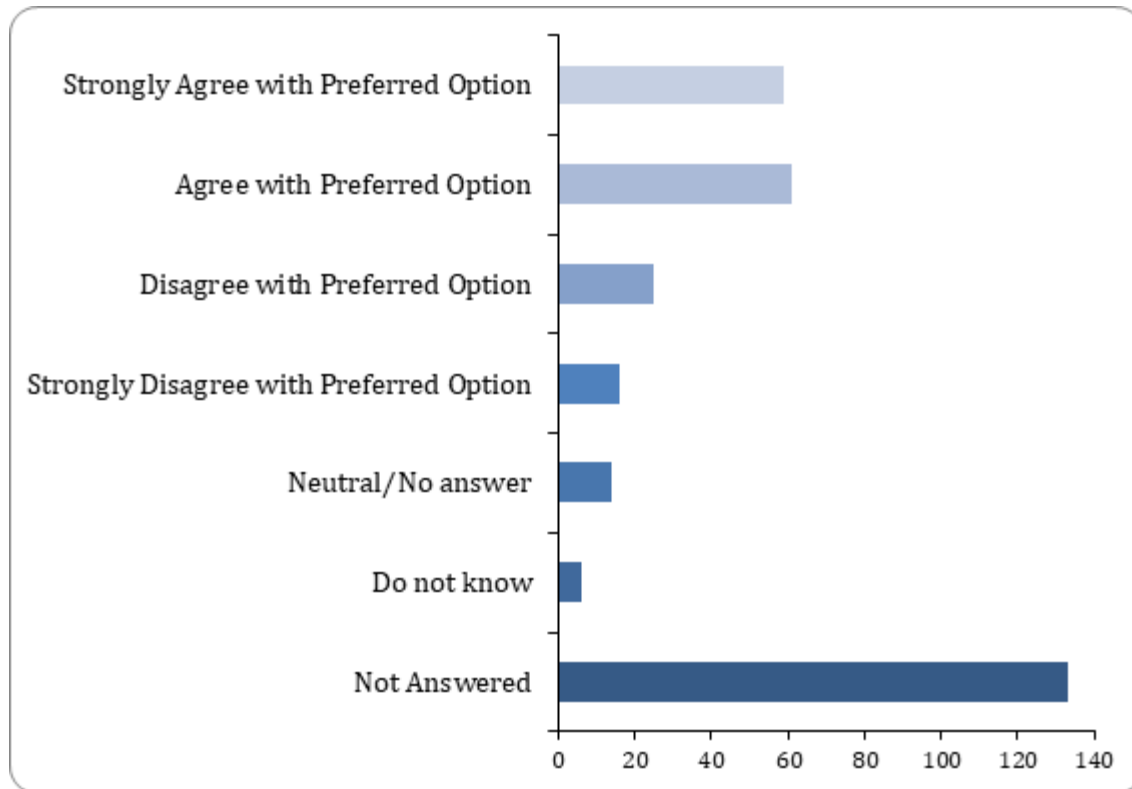
Statutory Consultee Responses – Draft Policy H9

There were no statutory responses to draft policy H9.

All Public Responses – Draft Policy H10

Please tell us what you think about policy options set 003b (draft policy H10): Location of new student accommodation.

There were 181 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%
Agree with Preferred Option	61	19.43%
Disagree with Preferred Option	25	7.96%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	14	4.46%
Do not know	6	1.91%
Not Answered	133	42.36%

Draft policy	Topic	Summary of comments	Response
H10	Clarification of policy clauses	Confirm how clause a) is operated / monitored over time, and further guidance required for clause b), regarding the expected indoor amenity space ratio to bedspaces.	Criterion a) is likely to be secured through planning condition. There are no set size or other requirements for indoor amenity space, the requirement is simply that there is some.
H10	Support policy flexibility outside term time	Support the continued allowance of other occupants outside of term times, where a management plan is in place. This supports not only the local economy but the College, through the use of space for conferences and/ or additional tourist accommodation. It would be helpful if the policy elaborated on the types of other occupants, for example, by saying it can be visitors paying per night and who might not be in education. This should not constitute a material change of use given the use would be restricted to students in full time education during term time, which is most of the time.	Support welcomed.
H10	Locational aspect – general support	Support but suggest that wording be adjusted to confirm that if the criteria are unable to be met, then there is a requirement to demonstrate that there are no reasonable alternatives available.	The policy sets out what are considered to be suitable locations, of which there are sufficient to meet the requirements of what is Policy H10 in the Draft Submission Oxford Local Plan.

H10	Additional restrictions to arterial roads	Policy should be amended to include an additional restriction to principal/arterial roads. This is to exclude student accommodation on side roads leading from district centres so as to prevent further issues	Restricting even further to arterial roads only within the centres is considered to be too restrictive

Draft policy	Topic	Summary of comments	Response
		of student noise etc. Support very strong restrictions on parking associated with student accommodation.	and could rule out too many sites that are suitable.

H10	Locational aspect is too restrictive - list of suitable locations should be expanded	Suitable locations should also include along arterial routes and those sites within a 15-minute walking distance of a campus/college. It is considered that the arterial routes in/out of Oxford present a logical and suitable option for locating new student accommodation given the frequency of public transport services along these routes and ease of access to/from both educational and social facilities and the reduced sensitivity of the residential environment. There are other policies in the Plan which address concerns relating to unacceptable changes in character to residential streets and ensuring that new development does not lead to adverse amenity impacts. The appropriateness of the location should be judged on a case-by-case basis. There might be a location that is outside of a centre / existing campus, and which has good public transport links to a university, and which has characteristics that make it unsuitable for conventional residential housing. The policy would be restrictive to both universities and the delivery of student accommodation by third party providers, given its interaction with Policy H11. Without the allocation of new sites, there needs to be greater flexibility on windfall locations to help both Universities meet the requirements of the threshold in Policy H11.	Sites within a 15-minute walking distance of a campus may well be wholly unsuitable sites.
H10	Objection – should include all universities and	The Policy is dependent on the identity of the applicant, which favours existing institutions and is an attempt to limit competition. There are not two but three universities in Oxford, as University of	The policy is not dependent on the identity of the applicant.

Draft policy	Topic	Summary of comments	Response
	boarding/ language schools	West London owns Ruskin Campus. The policy should also apply to boarding/ language schools and other institutions which don't have a campus.	
H10	Increase provision of purpose-built student accommodation	Recognise that provision of student accommodation can impact upon the availability of private market dwellings due to potential occupancy by students. Increased provision of student accommodation can therefore release these dwellings back into the marketplace. Provision of purpose-built-student accommodation positively impacts on the wider housing availability in the City by providing more accommodation at a higher density, thereby releasing housing stock back to the community.	Provision of student accommodation can free up market housing, but it can also compete for sites with market housing that delivers on-site affordable housing. The policy approach is about managing the impacts of student accommodation by ensuring it is in suitable locations.

H10	Amount of new student accommodation required should be justified	Student accommodation is already extensively used by non-students, including UNITE students accommodation, but especially in Oxford University Colleges where the university term lasts for less than half the year. Rooms are let out even in term time on a bed and breakfast basis and before they are allowed any more student accommodation, colleges should be required to demonstrate the use of their existing rooms and why they are not all used for students. Due to colleges' charitable status, the colleges renting out their facilities provides unfair competition to anyone trying to run a hotel or B and B in Oxford.	The policy does restrict occupation to those on longer courses. It does also allow use of the accommodation outside of term-time, which makes efficient use of the site and can help meet the needs of other types of students such as language students visiting Oxford outside of term times.
H10	Support	Support preferred option.	The support is welcomed.
Draft policy	Topic	Summary of comments	Response
H10	Support Alternative Option 3	New student accommodation should only be built on existing campus or student accommodation sites. Developing sites in other locations has led to a continued loss of family homes and areas which could have been developed for private residential use to meet the housing need have been replaced with development by educational establishments.	The Local Plan is required to understand and attempt to meet all types of housing need. There are sufficient sites in the outlined locations, but further restriction would not be justified.
H10	General comment	There should be restrictions on students generally bringing cars to Oxford in this policy, not just to only campus and accommodation sites. Student parking is already a problem in private HMOs.	Policies are restricted to what can reasonably be achieved through the planning system.

H10	General comment	This policy should expressly reference the need for student accommodation, and it should expressly support new accommodation that meets this need, not restrict it. Additionally, management restrictions should not be placed on new student accommodation.	The Local Plan is required to understand and attempt to meet all types of housing need, including for students. Without proper management of student accommodation, all the benefits of providing it for full time students are lost and the universities will have little or no control of meeting their thresholds for student numbers living within their own accommodation.

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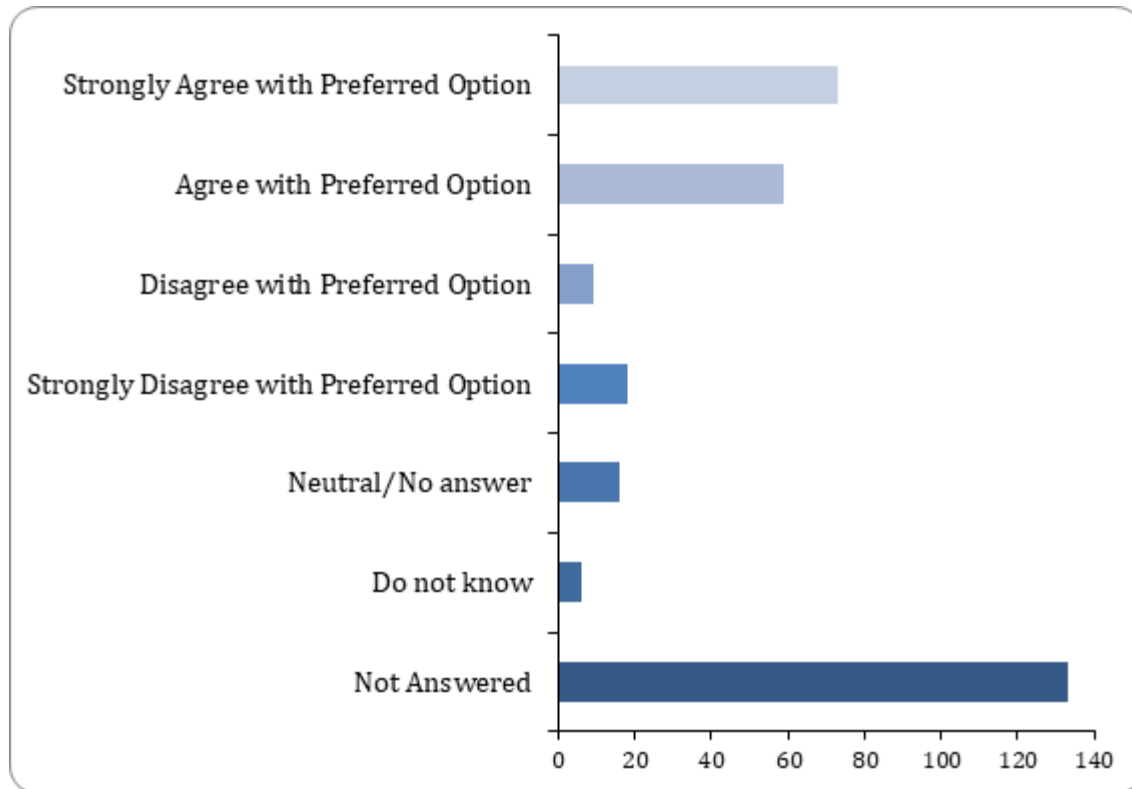
Statutory Consultee Responses – Draft Policy H10

There were not statutory responses to draft policy H10.

All Public Responses – Draft Policy H11

Please tell us what you think about policy options set 003c (draft policy H11):Ensuring there is enough student accommodation to meet needs.

There were 181 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	73	23.25%
Agree with Preferred Option	59	18.79%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	18	5.73%
Neutral/No answer	16	5.10%
Do not know	6	1.91%
Not Answered	133	42.36%

Draft policy	Topic	Summary of comments	Response
H11	Objection – don't link new academic floorspace with need for additional student accommodation	Too restrictive and will not allow leading institutions like the University of Oxford to expand and grow as it needs to, especially at a time when the UK is in desperate need for economic growth and innovation. Growth should be enabled, not held hostage, if the city wants both affordable housing and a thriving research ecosystem. Do not cap the number of students who live in the private market, they should be able to choose where they wish to live.	The thresholds are set above current levels and within what is achievable by the end of the threshold period, even with the forecast growth in student numbers requiring accommodation. It is a way of managing the potential negative impacts of student accommodation, without being overly restrictive.
H11	Objection – thresholds set too low	The data in the most recent Specialist Housing Needs Evidence by Icenii indicates that Policy H11 does not seek to support new accommodation to meet the universities' need. This is because it restricts any development that would expand University of Oxford and Oxford Brookes by more than 2,500 and 5,750 students respectively, however, these caps are around the same numbers as the new student accommodation beds needed. Therefore, the need will be present with or without the expansion restriction as proposed. The policy should be supporting development to meet this need, rather than restricting universities from expanding beyond the bed need.	The policy only applies to certain students - those in the defined list of students requiring accommodation. It is carefully calculated to be achievable, based on the expected growth in numbers of students requiring accommodation, and forecast increases in student rooms.

H11	General comment	Policy H11 makes development of new and improved university facilities reliant upon development of additional student accommodation. Consequently, policies which influence the development of student accommodation are integral to the achievability of the Local Plan's objectives. Policies which prevent the	The requirement for contributions to affordable housing from student accommodation is considered justified, and has been viability tested. It is not
Draft policy	Topic	Summary of comments	Response
		delivery of student accommodation, particularly on strategic sites, would undermine the delivery of the Local Plan as a whole and render it unsound. This is considered particularly relevant on the issue of affordable housing contributions from student accommodation discussed under policy H3.	considered to hinder development of additional student accommodation.
H11	University of Oxford Colleges should each be considered separately	Although Worcester College is a constituent college of the University of Oxford, it is a separate legal entity to the University. On this basis, it would not be reasonable for the College to have facility restrictions placed upon them whilst they cannot fully control other institutions. The College would seek additional wording such as; "Unless demonstrated that facilities associated with constituent colleges will have no impact on existing accommodation requirements for the relevant college".	This approach has applied to the university as a whole for decades and the University is able to supply necessary monitoring each year across the colleges. The needs as a whole, and the expected growth in student numbers of the university, have been considered when setting the policy.

H11	Clarity over review period	Agreeable to the proposed thresholds for the maximum number of students living in non-university owned accommodation. However, there is ambiguity of what the required information or process would be after 2033, or the terms of this review. This does not enable the Universities to undertake strategic planning with any certainty and would be grateful for further discussions on this element of the Policy.	Text has been added to clarify this.
H11	General support for policy	Several Colleges and others generally support the objective of Draft Policy H11.	Support noted.

Draft policy	Topic	Summary of comments	Response
H11	Support Alternative Option 1	Favour a free market approach - the private rental market will invest in student accommodation if the demand is there. Have students in private rental accommodation city wide to avoid overconcentration in certain neighbourhoods.	A free market approach could not at the same time ensure students were spread across the city.
H11	General comment	'Students' must include both undergraduates and graduates. Increase in numbers of postgraduate students must be closely monitored as the numbers continue to increase as fast as the Universities build new accommodation. Also set long term targets to ensure year on year reductions in student numbers living in non-student dedicated accommodation. The intention is to reclaim housing for council housing or for keyworker part rent/part buy.	The definition in the plan of students requiring accommodation does not exclude all postgraduates.

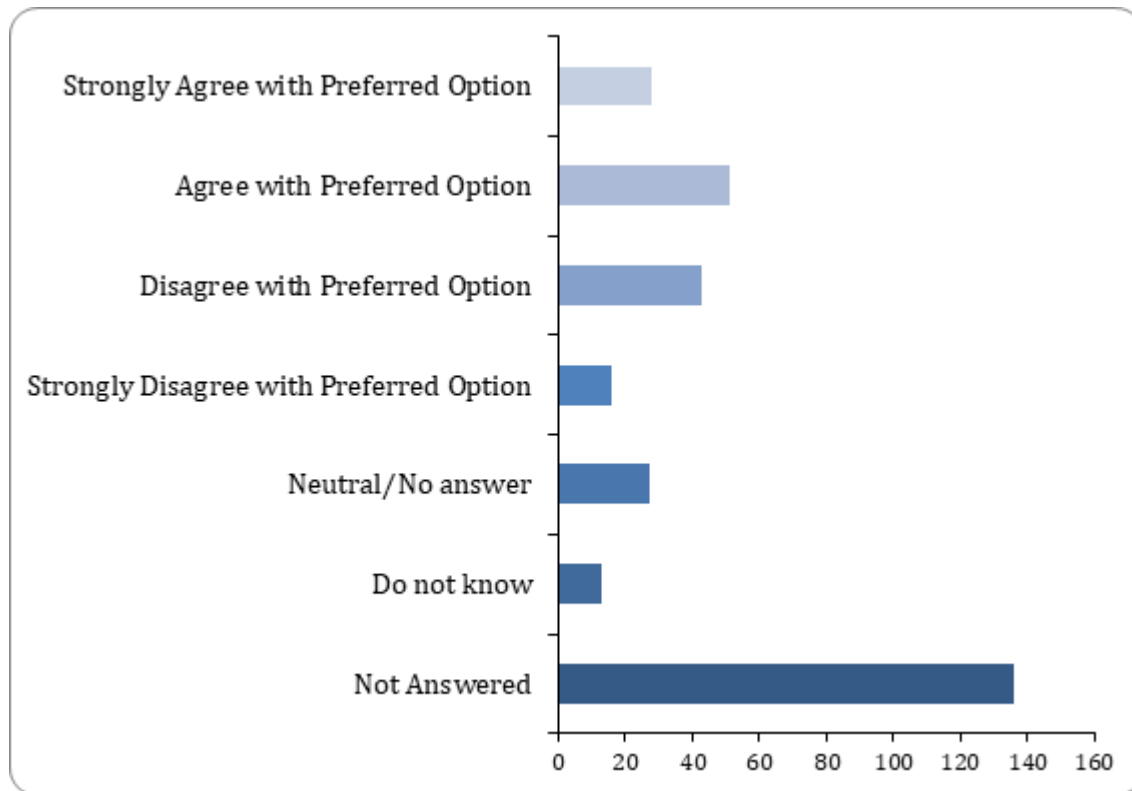
Statutory Consultee Responses – Draft Policy H11

There were no statutory responses to draft policy H11.

All Public Responses Draft Policy H12

Please tell us what you think about policy options set 003d (draft policy H12): Homes for Travelling Communities.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	28	8.92%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	43	13.69%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	27	8.60%
Do not know	13	4.14%
Not Answered	136	43.31%

Draft policy	Topic	Summary of comments	Response
H12	Preferred Option	Who would determine the criteria referred to in the preferred option? They may be impossible to meet.	The criteria in the preferred option have been informed by the latest Gypsy and Traveller Assessment (2024), as well as ensuring that the context is relative to Oxford's constrained area.
H12	Support Alternative Option 1	Sites should be allocated to meet the identified need - travelling communities have as much right as anyone else to live in Oxford. Also provides clarity to all about where the sites will be located. If the expected assessment of need for this type of site demonstrates that a site in Oxford is needed, we would encourage the council to find space for this within the city's boundaries. It is better to have a well-managed facility which can be cleaned and have the necessary provisions such as water, power, lighting and refuse collection, rather than to react on a case-by-case basis.	The latest evidence indicates that Oxford City does not have a need, therefore there is no justification to allocate sites. Should any proposals be submitted, the criteria as set out in the draft policy would ensure that these provisions would need to be met on site.

H12	Support Alternative Option 2	Default to national policy Traveller communities are a big nuisance in terms of causing antisocial behaviour and environmental problems for the surrounding communities. They should not be encouraged or allocated sites.	There would not be any policy to help in the assessment of the impact, should a site come forward if only national policy was relied on. The December 2024 update to the Planning policy for traveller sites made clear that the Government's
Draft policy	Topic	Summary of comments	Response
			overarching aim is to ensure fair and equal treatment for travellers, whilst also respecting the interests of the settled community.

H12	Designate stopping sites	Through freedom of information requests, Friends, Families and Travellers found in 2024 that there is a lack of transit site provision across the UK, despite repeated recommendations from national and international bodies. The Council should search for sites that can deliver temporary stopping places for Travellers. Oxfordshire County Council's 2024 needs assessment highlighted that there are currently no transit pitches available in Oxford City, yet across Oxfordshire there were 22 reported encampments between May 2022 to October 2023. Even if sites are not designated, the council should identify areas that could potentially be used by travellers "on hand" so that they may be efficiently allocated space rather than being caught up in an endless waiting process.	Noted. The latest Gypsy and Traveller Assessment recognises that all Oxfordshire authorities should work together to address the lack of stopping sites in the County.
H12	General comment	Any proposals for traveller sites should be carefully scrutinised to ensure they do not negatively impact local neighbourhoods.	The draft policy makes it clear that all criteria in the policy would have to be met for a proposal to be acceptable.
H12	General comment	This will only work if engaging with the travelling community.	The travelling community have been involved and were a key part of informing the data in the latest

Draft policy	Topic	Summary of comments	Response
			Gypsy and Traveller Assessment (2024).

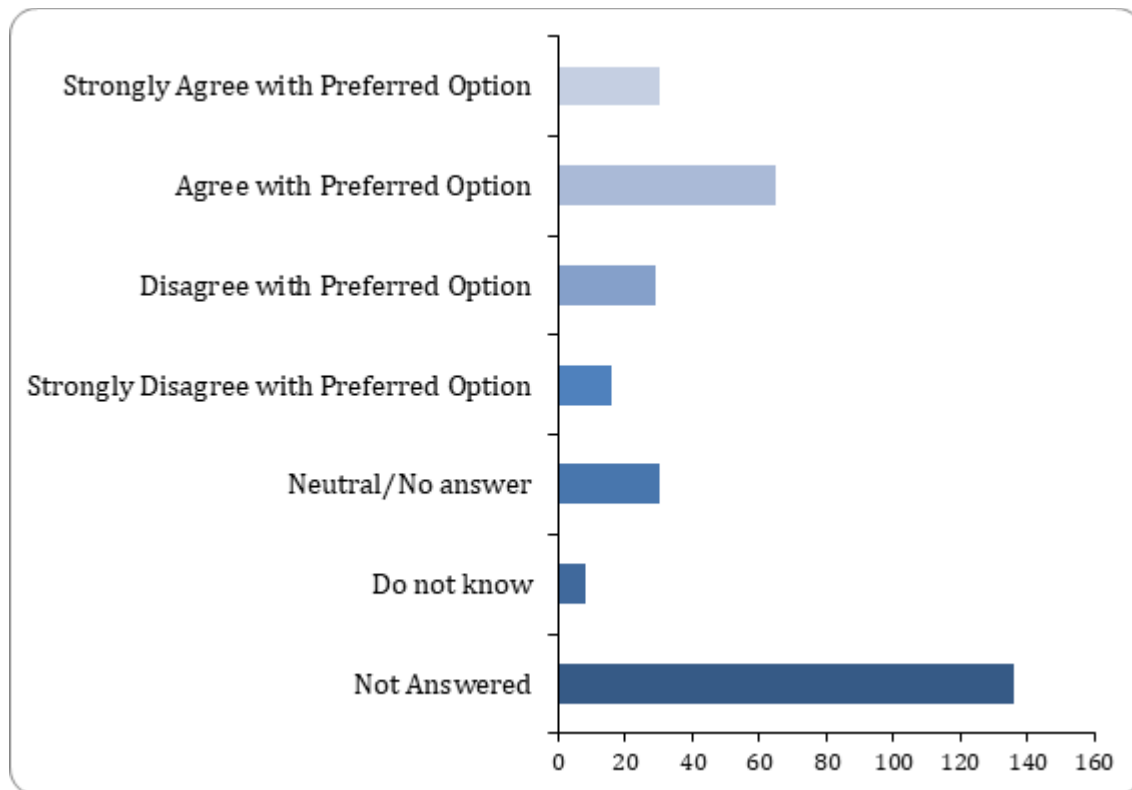
Statutory Consultee Responses – Draft Policy H12

There were no statutory consultee responses to draft policy H12.

All Public Responses – Draft Policy H13

Please tell us what you think about policy options set 003e (draft policy H13): Homes for Boat Dwellers.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	30	9.55%
Agree with Preferred Option	65	20.70%
Disagree with Preferred Option	29	9.24%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	30	9.55%
Do not know	8	2.55%
Not Answered	136	43.31%

Draft policy	Topic	Summary of comments	Response
H13	Support Alternative Option 1	Search for sites to allocate new moorings. The 2024 assessment concedes that despite a need being identified in Oxford, there is limited potential. Allocating even a small, well-screened strip – perhaps by repurposing disused wharfage or incorporating moorings into a wider regeneration scheme—would give boat dwellers a legitimate, serviced option and ease pressure on land-based housing. This is a more pro-active approach where moorings can be prepared with sanitation, water and power facilities, and be considerate of other waterway traffic and users. Reacting case by case is inefficient.	This will not necessarily result in delivery of sites if there is no landowner interest. Searches for suitable sites show there are few potential sites in Oxford remaining. Some actions, such as converting visitor moorings to residential, can't be brought forward through the planning system.
H13	Support Alternative Option 2	Do not allocate sites or set out policy criteria	This would result in a lack of clarity and consistency of approach with no planning policy framework by which to assess planning applications.
H13	Provides a more affordable way of living	Boat dwellings are one of the few remaining unique and affordable ways for people from a diversity of socio-economic backgrounds to live and work in Oxford - it's essential that mooring spaces be increased gradually over time in line with other increases in dwelling spaces.	They can provide a more affordable way of living, although this isn't always the case due to cost of boat maintenance etc.
H13	Object to all proposed options	Disagree with all options. A new policy shared with neighbouring local authorities should be created which allocate sites for new permanent moorings based upon a realistic, independent assessment of demand.	This will not necessarily result in delivery of sites if there is no landowner interest.

H13	General comment	There seems to be no oversight and management of these boat sites. Many boats are either half-sunk or in disrepair and are an eye-sore. Need stricter controls and monitoring over exteriors areas to manage this.	Noted. In Oxford, the control of residential moorings falls under the Environment Agency for the
Draft policy	Topic	Summary of comments	Response
			River Thames and the Canal and River Trust for the Oxford Canal.
H13	General comment	Hopefully you are engaging with relevant local communities to find out if they are happy with this.	The boat dwellers community have been involved and were a key part of informing the data in the latest Boat Dwellers Assessment (2024).

Statutory Consultee Responses – Draft Policy H13

South Oxfordshire District Council and Vale of White Horse District Council

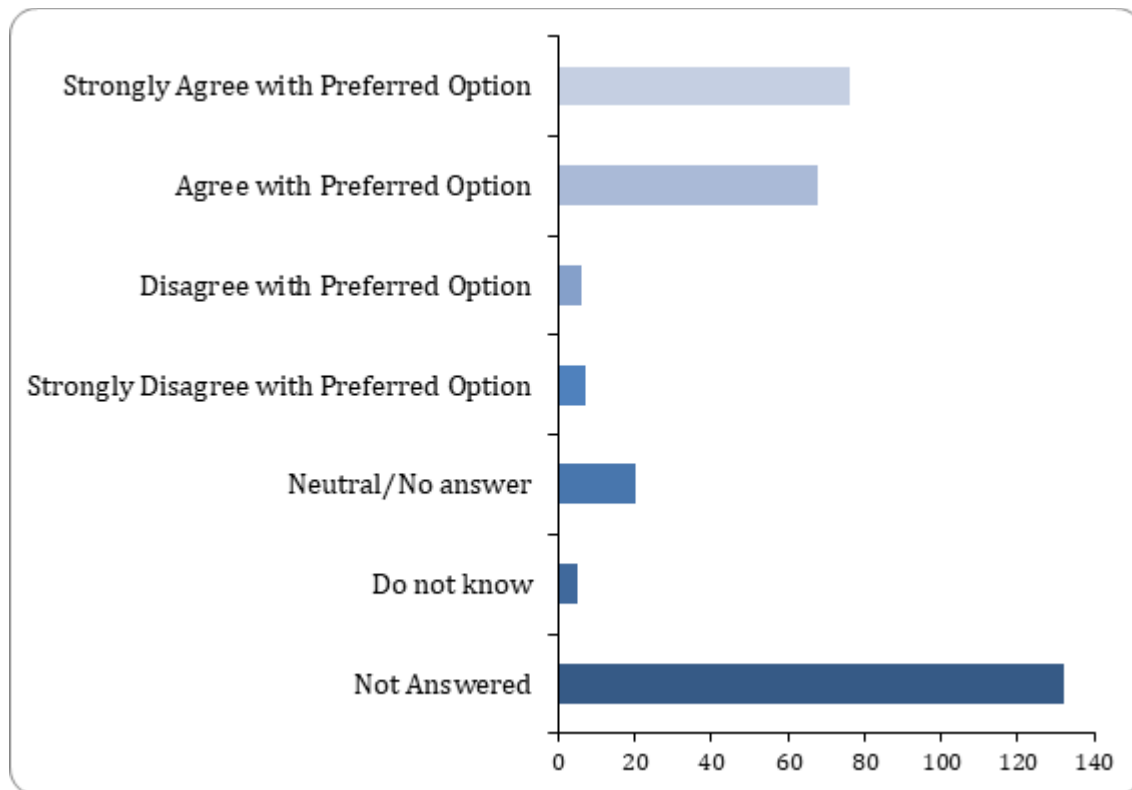
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy H13 Homes for boat dwellers	References to need in Oxford and Oxfordshire aren't precisely aligned to the joint evidence in the GTAA at para. 9.30, and this should reflect the evidence.	Paragraph 2.49 of the Reg 18 document does reference the need expressed in paragraph 9.30 of the joint Oxfordshire Boat Dwellers Assessment. The associated Background Paper for Specialist Housing already explains the justification for using a criteria-based policy approach.	No action required.

All Public Responses – Draft Policy H14

Please tell us what you think about policy options set 003f (draft policy H14): Older Persons and Other Specialist Accommodation.

There were 182 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	76	24.20%
Agree with Preferred Option	68	21.66%
Disagree with Preferred Option	6	1.91%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	20	6.37%
Do not know	5	1.59%
Not Answered	132	42.04%

Draft policy	Topic	Summary of comments	Response
H14	Support	Support for preferred option	Support welcomed.
H14	Policy should go further	The housing needs data referenced within the supporting text has been superseded by the June 2025 study which demonstrates a significantly larger requirement for older persons housing of all types. The policy should recognise the benefits to the wider housing stock (releasing underoccupied homes) as well as the many savings and health benefits associated with the provision of such housing. As drafted, the policy is negative ("will only be granted where..."). We recommend that this draft policy is rewritten and suggest the following by way of example. <i>Proposals for specialist and supported housing will be strongly supported where applicants provide evidence of appropriate existing transport and other services within the vicinity of the proposal site.</i> <i>Over the plan period, targets will reflect the latest evidence of housing need (at the time of writing being the June 2025 Housing Needs evidence base).</i>	The Specialist Housing Needs Assessment has been updated in November 2025. The policy wording is consistent with other policies in the plan.
H14	Sufficient exterior space	There must be enough green space, easy access for visitors, parking spaces, etc.	Agreed- the intention is that the criteria ensure this.
H14	No policy	There should be no policy interfering in this or relating to elderly persons or supported accommodation in any way.	It is considered important to ensure a good quality living environment for everyone.

H14	Ensure no 'ghetto'	It is important there are no areas with homogenous demographics- it must be mixed. Preferred option fine as long as that's avoided.	In Oxford any delivery of this kind of housing will be limited in size and part of a mixed-use area because of the nature of development opportunities.
H14	Does not need to be in the city/no requirement in	There may be more space and less pressure on local infrastructure outside the city. Many elderly people do not work and this may help reduce housing costs in the city for working residents. There is not an	The policy approach is to ensure what does come forward is suitable, but not to make it a
Draft policy	Topic	Summary of comments	Response
	city/prefer option 4	over-whelming housing need for older persons accommodation. There are, however, hundreds of single homeless people in desperate need. Therefore, the priority is elsewhere.	requirement that would then be competing with other needs.
H14	Quality of care homes	What can be done to encourage better access to affordable, publiclyowned or communal-ownership structures for care homes that have a high quality of care?	Many solutions will be outside the planning system.
H14	Balance requirements against delivery	This type of accommodation can help free up family homes, so it's important it's not restrictive, but it's also important that it is good quality.	Agreed, and the criteria will attempt to strike the right balance.
H14	Prefer option 2	Prefer option 2 or wonder if it cannot be incorporated into option 1 as it sounds like a good idea to ensure a mix of housing and types of residents.	Option 2 is not mutually exclusive to the preferred option, but it is not favoured for the reasons set out in Background Paper 003

Statutory Consultee Responses – Draft Policy H14

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy H14 Older Persons and other	Strategic Planning and Housing teams The County Council's evidence of need for affordable extra care housing is set out in the existing market position statement supplement. As the County Council's interest is predominantly in respect of affordable	The County's specialist and supported housing needs assessment sets out that c.145 affordable extra care housing units	ACTION: Potential meeting/ discussion with Strategic

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

1970

specialist housing	housing, rather than market provision of housing for older people, our comments on this issue are covered earlier in this response in respect of Policies H2, H4 and H7. However, we support the part of this policy which indicates that planning permission will not be granted for the loss of existing specialist care accommodation unless replaced or there is evidence of no need for the facility. Public Health This policy is supported, and we would like to see additional wording which elaborates on the term 'gardens' in the draft wording, with emphasis on dementia-friendly design. Studies have shown that the design of outdoor spaces (such as the choice of sensory planting and wayfinding) and indoor spaces (level accesses) can significantly	are required by 2044. The City's specialist housing needs assessment (published to support the Reg.18 consultation) shows a similar amount of need for the planperiod. Noted. We will consider whether we can incorporate the phrase 'dementiafriendly design' as relating to gardens. Noted.	Planning and Housing Teams No action required. Oxford City Action: Consider incorporating some text around 'dementia-friendly garden design'

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	improve the quality of life of those living with dementia and enable them to stay living in their homes for longer: https://www.kirklees.gov.uk/beta/health-and-wellbeing/pdf/kirklees-dementia-design-guide.pdf		

BOB ICB

Draft Policy	Summary	Response	Outcome

Policy H14 Older Persons and Supported accommodation	The ICB published its Primary Care Strategy in 2024, and it sets out that the population of BOB will increase over the next 10 years in particular the older population who make the greatest use of healthcare services. GP appointments would need to increase by 55% and this would represent an unsustainable level of growth in terms of available funding and workforce if there is no change to the existing care model.	Noted. Noted.	No further action
Draft Policy	Summary	Response	Outcome

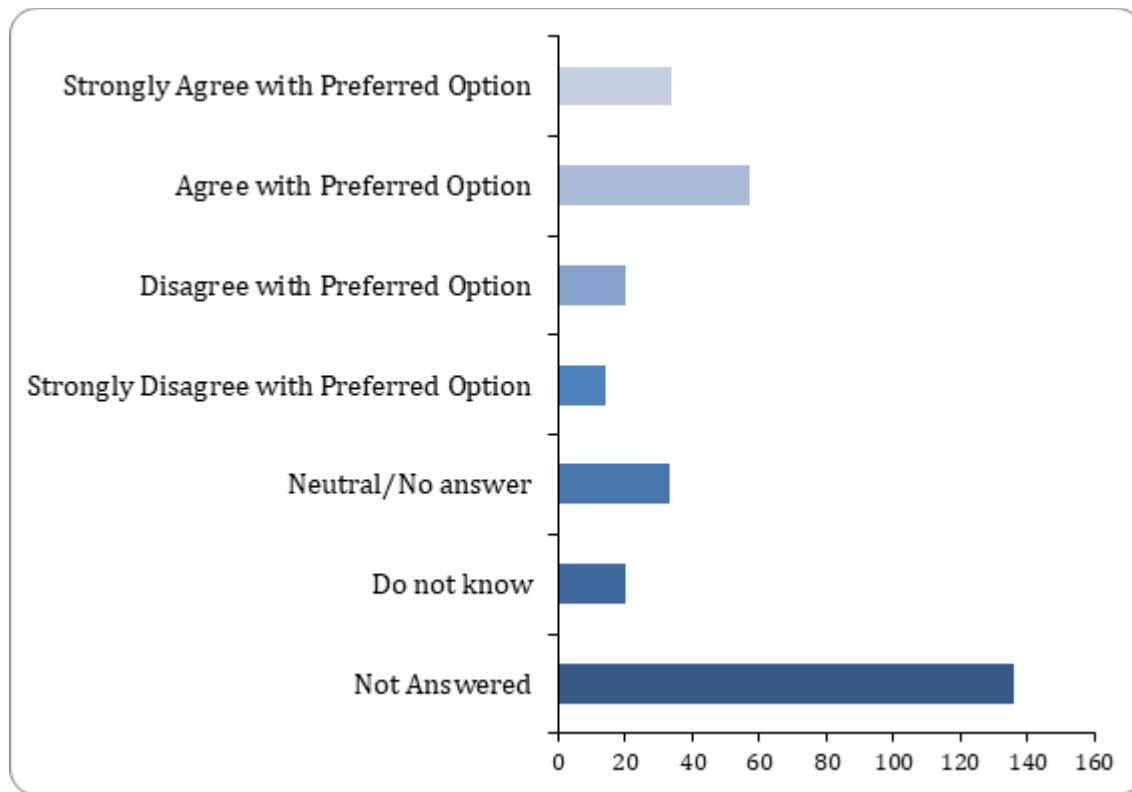
	Considering the scale of this type of development in the City will be limited, the ICB considers that robust evidence should be requested to identify appropriate primary care mitigation measures to accommodate this extra demand. The ICB notes that the Council has published a technical advisory note related to Health Impact Assessment (HIA). The ICB considers that the submission of a HIA would be appropriate evidence to demonstrate the provision for older persons and other specialist accommodation would not exacerbate the capacity of the nearby existing primary healthcare provisions. The ICB should also be consulted in this type of planning application.	Appropriate primary care infrastructure required to mitigate the level of development proposed in the Local Plan should be identified and projects/ schemes set out in the IDP. It is not the role of the City Council to identify healthcare infrastructure, nor is it the role of developers. Noted.	

Draft Policy	Summary	Response	Outcome
	BOB ICB propose the following amendment to Policy H14: Planning permission for accommodation for older people and supported and specialist care will only be granted where it: a) Is located with good access to local facilities and services including public transport, shops, and healthcare facilities; and ~~b) Includes the submission of a Health Impact Assessment (HIA) is to provide an assessment of the impacts of the proposals in healthcare provision and any mitigation measures are identified~~ in the scheme; and b) ~~c)~~ Is located close to or as part of a mixed community and will contribute positively to the creation and/or maintenance of mixed and balanced communities; and c) ~~d)~~ Is appropriate for the neighbourhood in terms of form, scale, and design...	The Plan already contains a policy (HD10) which sets out when an HIA would be required. As the threshold is for “major development” (i.e., 10 or more homes or 1,000sqm or more of employment floorspace), this would mean that development proposals for accommodation for older people would already produce an HIA for such proposals. Inclusion of a requirement in this policy is therefore not required as it is already covered in the HIA policy.	

All Public Responses – Draft Policy H15

Please tell us what you think about policy options set 003g (draft policy H15): Self-build and custom house building.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	34	10.83%
Agree with Preferred Option	57	18.15%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	14	4.46%
Neutral/No answer	33	10.51%
Do not know	20	6.37%
Not Answered	136	43.31%

Draft policy	Topic	Summary of comments	Response
H15		ONV notes that policy H14 is not effective when applied to higher density housing schemes that the plan is aiming for to make efficient use of land. In particular, schemes that include apartments or flats. In such developments it is not practical to have self-build properties. It may be possible to allow people to fit out an apartment, but this could be difficult in terms of noise and disturbance for adjacent occupiers and location of services etc. A suitable caveat should be added to the list in the policy as currently it only excludes flatted development on brownfield land. The concerns noted above would arise on brownfield or greenfield sites.	On greenfield sites there is far more option to deliver a variety of housing types.
H15	Policy should be more ambitious	Community-led housing is supported via DRAFT POLICY H15: SELFBUILD & CUSTOM HOUSEBUILDING. However, this policy offers much less CLH ambition than in the emerging South and Vale, Cherwell and West Oxfordshire Local Plans. These have drafted more detailed policies in support of community-led housing, in line with the requirements of the new NPPF. The Oxford Plan could very usefully and straightforwardly include a policy for community led housing such as that included in the South Oxfordshire District Council and Vale of White Horse and Vale of White Horse joint submitted Local Plan (<i>JLP policy copied in text</i>). Such a policy would also recognise and much better reflect the pioneering role that the City Council has historically taken (and continues to do so) with regard to the promotion and advocacy of community-led housing.	The needs in Oxford are very different to those in the more rural areas surrounding it. The NPPF says that planning authorities should seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing. The local plan policy is generally supportive, but it is not considered it needs to go further.

			In Oxford, mall sites are the norm, and all that is available to meet most needs.
H15	Feasibility	On complex and constrained brownfield sites such as Templars Square, where comprehensive, higher density mixed use development is required and design and active frontages are a key element of the	The policy acknowledges that there are sites where the policy may not be appropriate, such as

Draft policy	Topic	Summary of comments	Response

		masterplan, this policy creates challenges in terms of feasibility, construction programme/phasing/management, and limits the ability to optimise the housing delivery on-site. We therefore request that the policy includes wording to prioritise comprehensive development and site optimisation, over rigid application of the 5%. We also request that it is acknowledged that this percentage target may be challenging to achieve on constrained and complex urban sites and is not required to be met at the Templars Square site.	brownfield sites with flatted developments.
H15	Site threshold	challenge the increased threshold for the provision of land for selfbuild from 5% on sites of 50 units or more to 100 units or more, making it more difficult for community-led housing groups to acquire land for self-build affordable housing projects.	The threshold is set for self-build at a level sufficient to meet forecast needs over the Plan period, whilst also ensuring a large enough group of plots come forward to be feasible to deliver.
H15	Support for preferred option	We seek assurance that such self-build and custom housing is bound by the same policies as other development and specific mention that Policy G1 and G4 apply.	Developments which come forward under H15 would also be subject to the other relevant policies in the plan, the same as any other development propopsal.
H15	Support for option 2	Support of more freedom and pushing the policy	Support is welcomed.
H15	Support the policy but encourage more environmental initiatives	Provide incentives for ecological net-positives of the buildings to look at environmental and social benefits	Environmental and social measures to be delivered through any development would be addressed through other policies in the plan.

H15	Support to try and help affordability issues	A few comments all agreeing this is a good policy and should be pushed forward by the council to address affordability and pushing social cohesion	Support is welcomed.

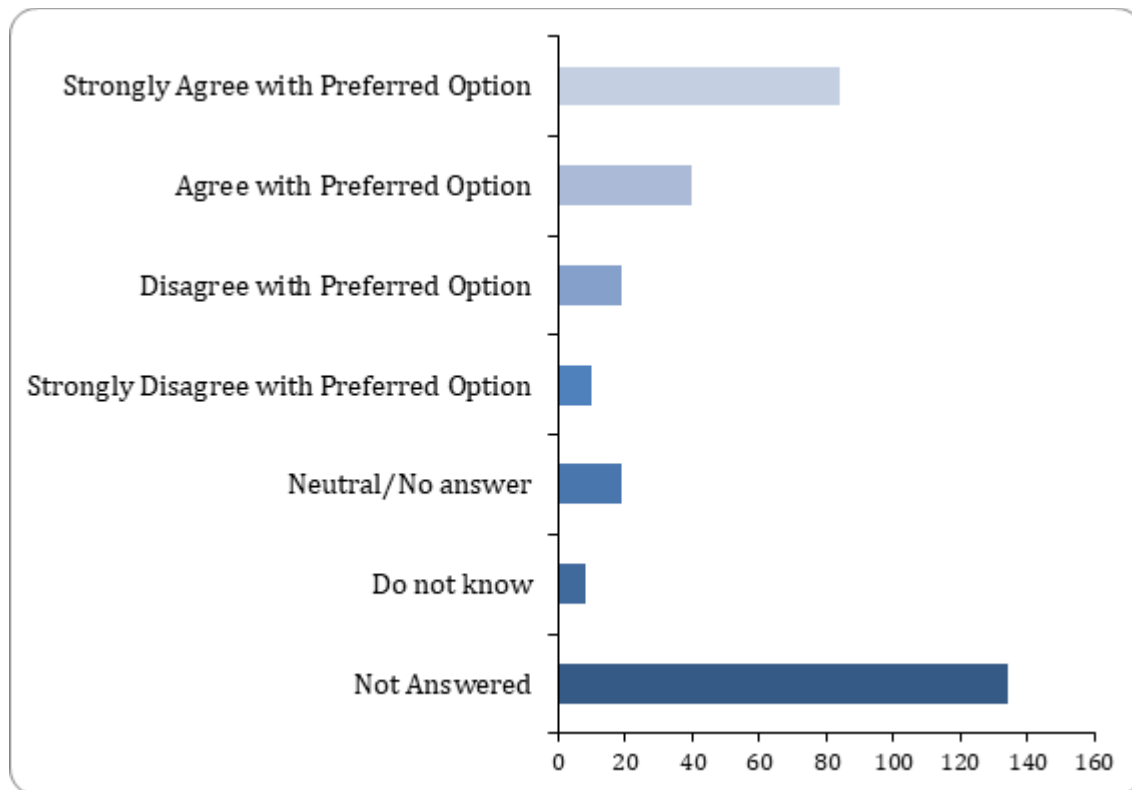
Statutory Consultee Responses – Draft Policy H15

There were no statutory consultee responses to draft policy H15.

All Public Responses – Draft Policy H16

Please tell us what you think about policy options set 003i (draft policy H16): Boarding School Accommodation.

There were 180 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	84	26.75%
Agree with Preferred Option	40	12.74%
Disagree with Preferred Option	19	6.05%
Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	19	6.05%
Do not know	8	2.55%
Not Answered	134	42.68%

Draft policy	Topic	Summary of comments	Response
H16	Objection	Policy is unjustified. What is the justification for the accommodation being adjacent to the teaching campus?	The location of the new boarding development may affect the safety and amenity of students and local residents and neighbouring residential properties.
H16	No want for policy	Support of no policy	Noted
H16	Support of policy	Support of complete policy	Support is welcomed
H16	Support	ChCh supports this policy in the context of its own School requirements. Policy should acknowledge that new boarding accommodation can be provided either as a new building or conversion of an existing building, which may be in an alternative use.	The policy wording covers new or extended boarding accommodation. Conversions would be covered within this.

Statutory Consultee Responses – Draft Policy H16

There were no statutory consultee responses to draft policy H16.

All Public Responses to the Whole of Chapter 2

Draft policy	Topic	Summary of comments	Response

Chapter 2	Bring vacant homes back into use	Would welcome a policy around using CPO to bring empty homes back into use, along with retrofitting, to provide more affordable housing and an environmentally responsible approach to the housing crisis.	Although Oxford has a severe housing shortage, bringing empty properties back into use is not a statutory function. Oxford City Council encourages owners to bring empty homes back into use
Draft policy	Topic	Summary of comments	Response
			through support, advice, and by imposing significant council tax premiums on long-term empty properties. The Plan supports retrofitting in Policy R3, which supports retrofit measures to existing buildings where they secure energy efficiency improvements or adaptation to changing climate.

Chapter 3 - A Prosperous City with a Globally Important Role in Learning

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Headlines for Chapter 3:

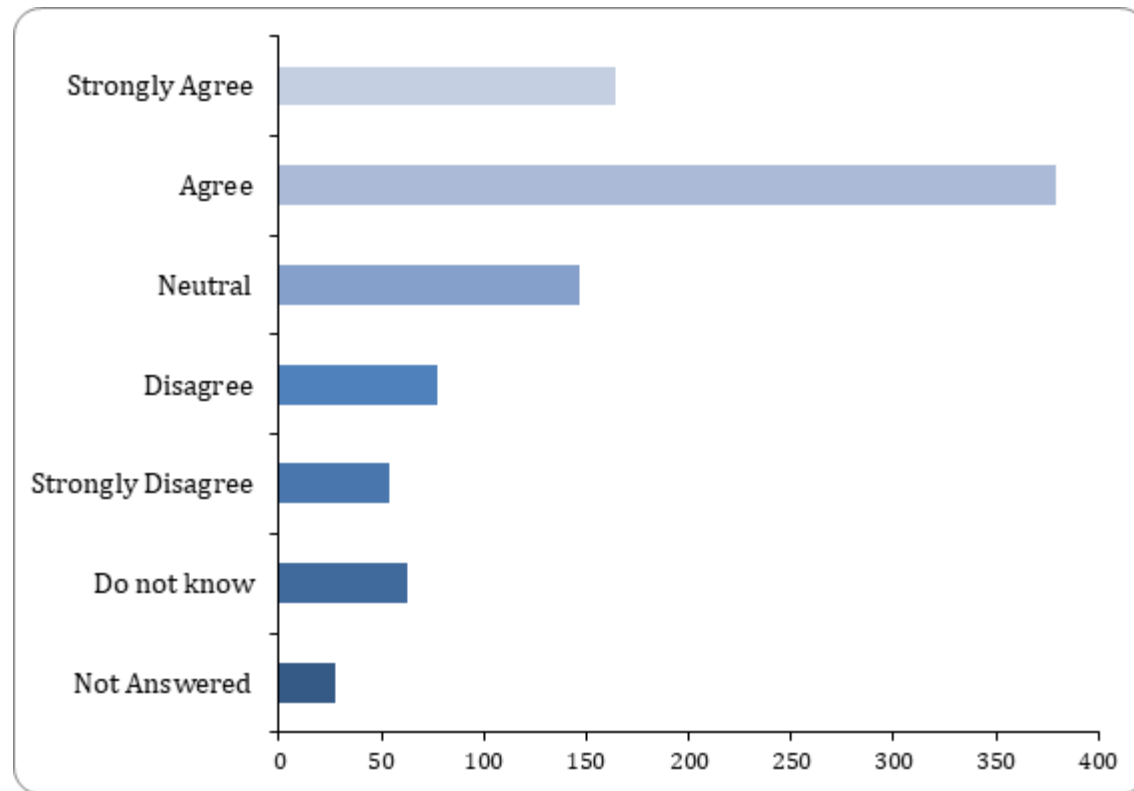
- ELNA – general support for policy
- Employment land should not be competing with land needed for housing
- Employment land should be competing with existing infrastructure
- General support for housing on employment sites
- General support for Community Employment Procurement Plans (CEPP)
- Clarification around what affordable workspaces means
- Numerous commentaries around developing derelict buildings and old office space
- Minor commentary disagreeing with proposed policies

Short questionnaire responses

Employment Sites

We have identified what we think are key employment sites in the city that we should protect. These are sites that support Oxford's internationally important role in education, research and health, and also those that support a diverse and strong economy. We are not protecting any employment sites in the city centre or district centres, to give full flexibility in those areas, for example to allow for offices to change use to housing. To what extent do you agree with this approach?

There were 884 responses to this part of the question.

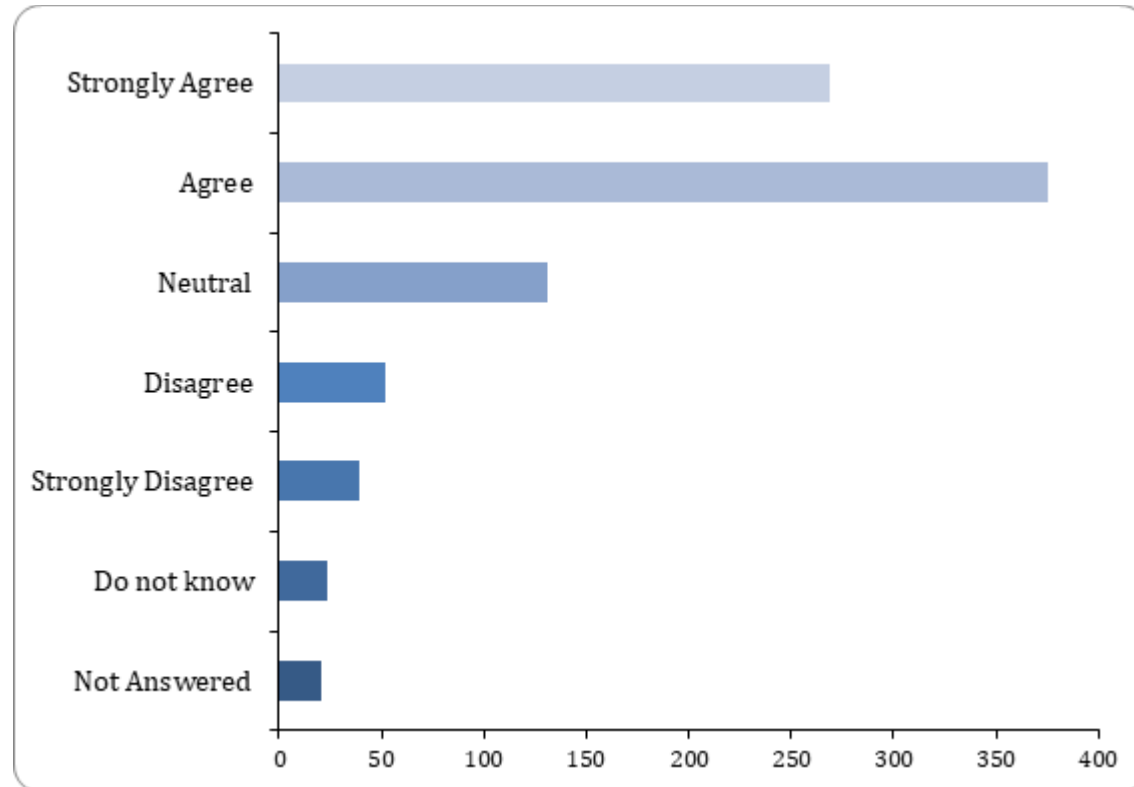


Option	Total	Percent
Strongly Agree	164	18.00%
Agree	379	41.60%
Neutral	147	16.14%
Disagree	77	8.45%
Strongly Disagree	54	5.93%
Do not know	63	6.92%
Not Answered	27	2.96%

CEPPS

We propose requiring community employment plans so that work and training opportunities are given to local people.
To what extent do you agree with this approach?

There were 890 responses to this part of the question.



Option	Total	Percent
Strongly Agree	269	29.53%
Agree	375	41.16%
Neutral	131	14.38%

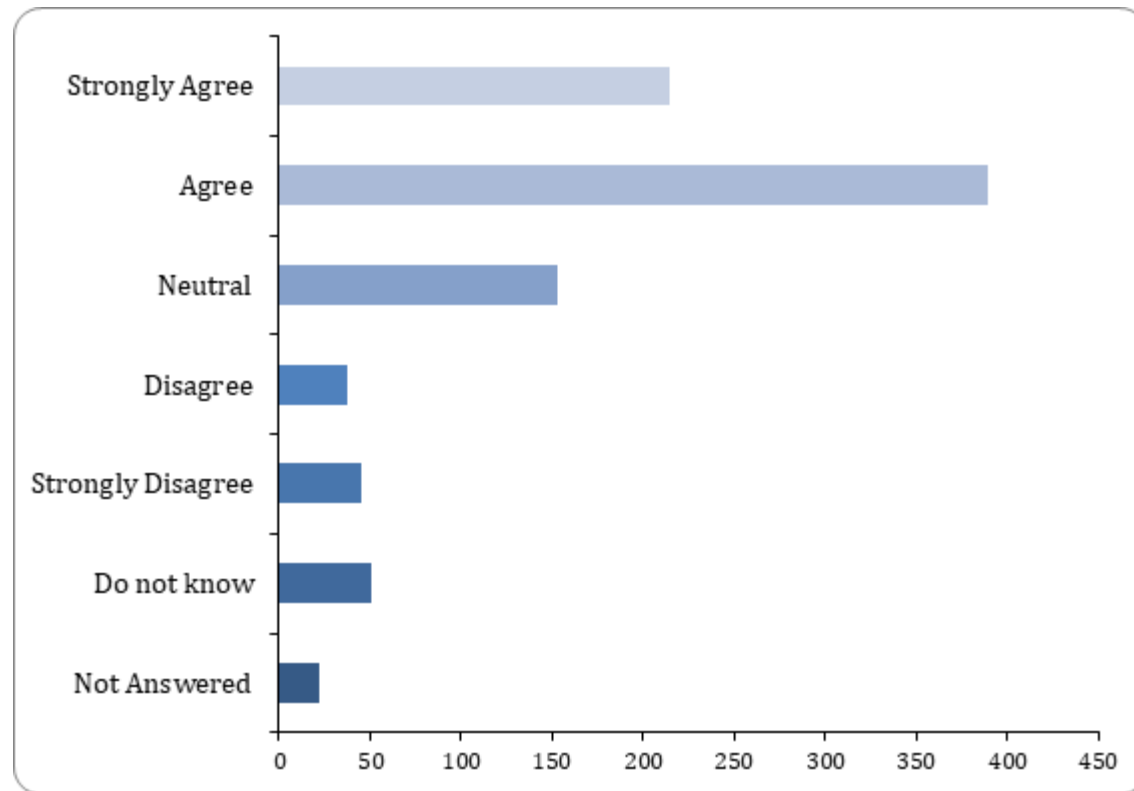
Disagree	52	5.71%
Strongly Disagree	39	4.28%
Do not know	24	2.63%
Not Answered	21	2.31%

Affordable workspaces

Affordable workspace is proposed as a new policy approach- the largest key employment sites will be expected to deliver an affordable workspace strategy, to ensure a range of employment types and businesses.

To what extent to you agree with this approach?

There were 889 responses to this part of the question.

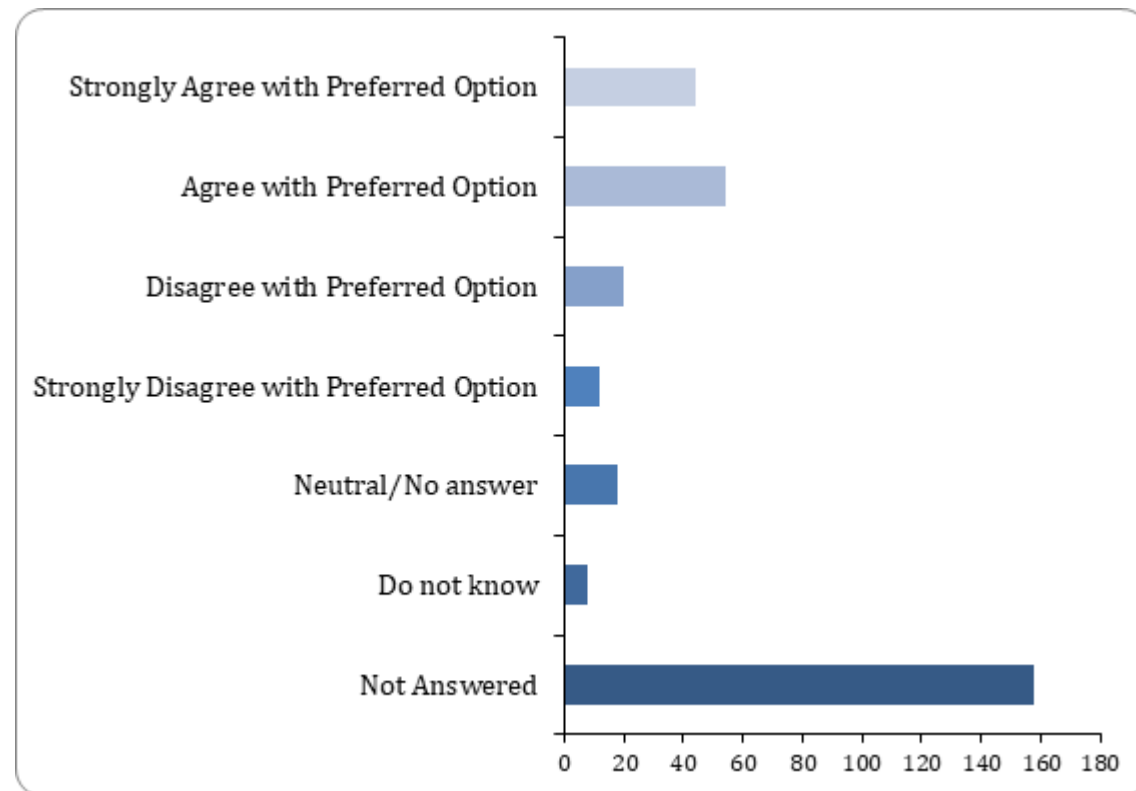


Option	Total	Percent
Strongly Agree	214	23.49%
Agree	389	42.70%
Neutral	153	16.79%
Disagree	37	4.06%
Strongly Disagree	45	4.94%
Do not know	51	5.60%
Not Answered	22	2.41%

All Public Responses - Draft Policy E1

Please tell us what you think about policy options set 004a-1 (draft policy E1): Addressing Employment Land Needs. If you have any additional comments please put them in the comment box below.

There were 156 responses to this part of the question.



Option	Total	Percent

Strongly Agree with Preferred Option	44	14.01%
Agree with Preferred Option	54	17.20%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	12	3.82%
Neutral/No answer	18	5.73%
Do not know	8	2.55%
Not Answered	158	50.32%

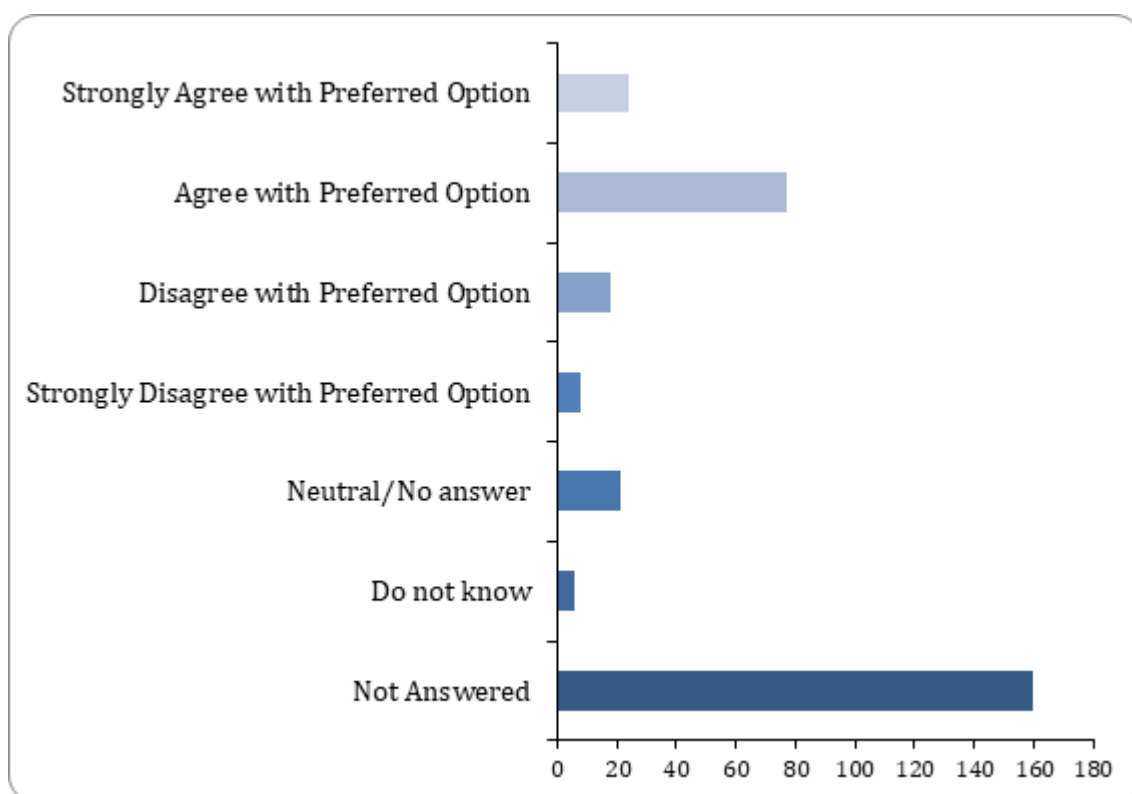
Please tell us what you think about policy options set 004a-

2 (draft policy E1): Making the

best

use of employment sites. If you have any additional comments please put them in the comment box below.

There were 154 responses to this part of the question.



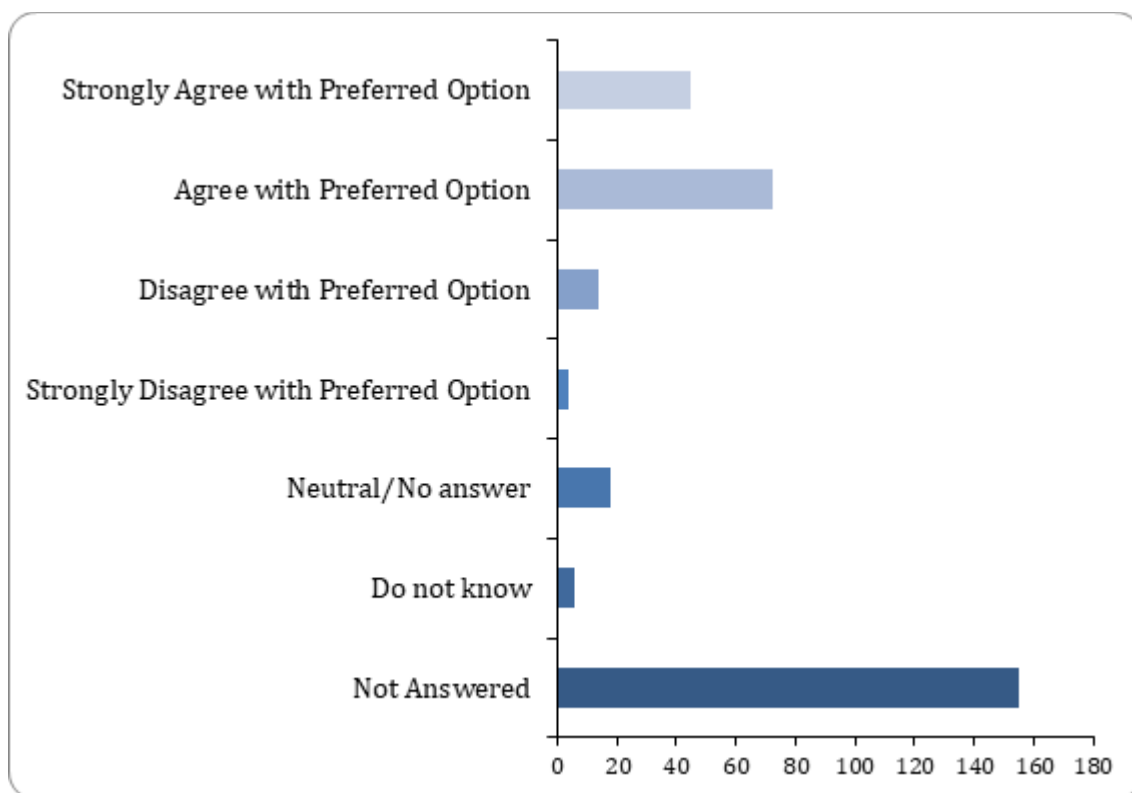
Option	Total	Percent
Strongly Agree with Preferred Option	24	7.64%
Agree with Preferred Option	77	24.52%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	21	6.69%
Do not know	6	1.91%
Not Answered	160	50.96%

Please tell us what you think about policy options set 004a-

3 (draft policy E1): Housing

on Employment Sites. If you have any additional comments please put them in the comment box below.

There were 159 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	72	22.93%
Disagree with Preferred Option	14	4.46%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	18	5.73%

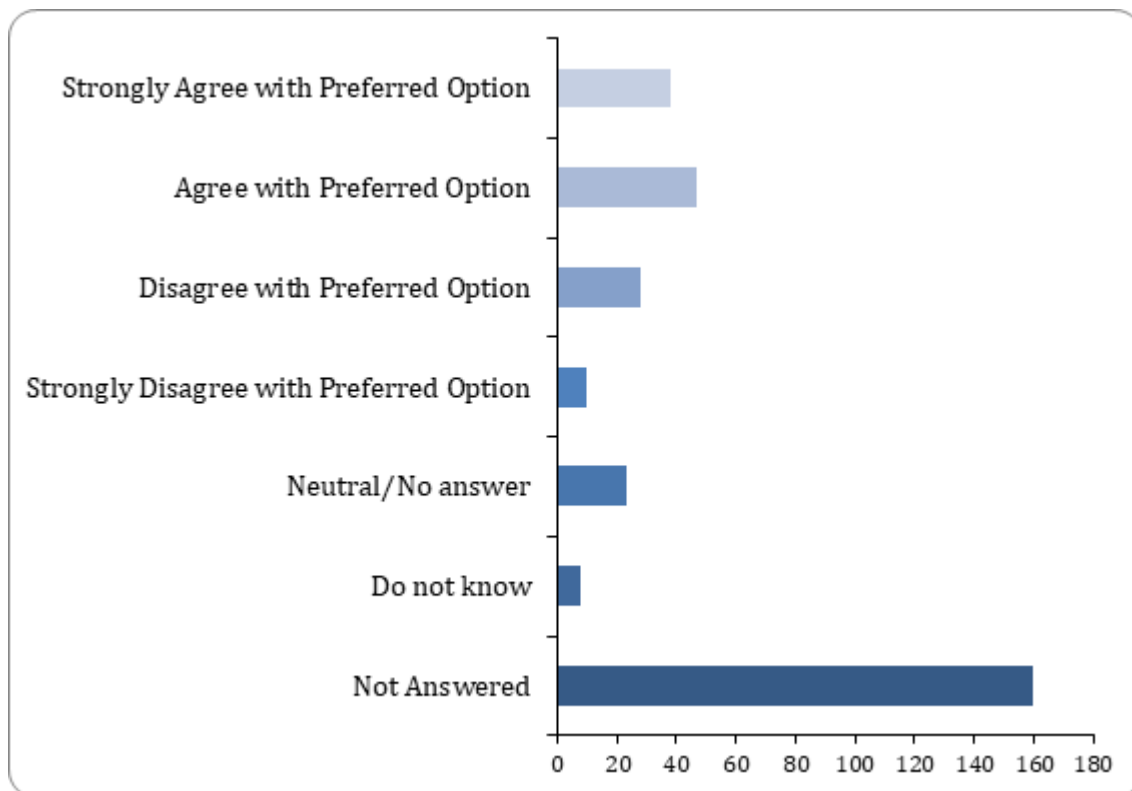
Please tell us what you think about policy options set 004a-

Do not know	6	1.91%
Not Answered	155	49.36%

.

4 (draft policy E1): Location of New Employment Uses. If you have any additional comments please put them in the comment box below.

There were 154 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	38	12.10%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	28	8.92%

Please tell us what you think about policy options set 004a-

Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	23	7.32%
Do not know	8	2.55%
Not Answered	160	50.96%

Draft policy	Topic	Summary of comments	Response
E1	Support	We support the preferred option to attempt to meet employment needs, while balancing other uses, in particular housing. We consider that designated employment sites, such as Oxford North, are the best locations for intensification of employment uses to meet employment needs. ONV support the preferred option of seeking to maximise existing employment sites to ensure that best use is made of those allocated, to meet employment needs. Supporting the intensification of the city's existing key employment sites will enable employment land needs to be met on existing sites where successful clusters can be established. ONV notes the proposed provision of housing on non-designated employment sites. This is recognised as being a potential source of housing numbers supporting the Council's ability to meet housing need. Oxford North is a mixeduse site and the land uses identified include residential development and commercial/ employment development. The site allocation policy for Northern Gateway/	Support noted. Support noted. Support noted.

		Oxford North has not yet been released however, this should allow for flexibility over the location of the uses	

Draft policy	Topic	Summary of comments	Response
		within the allocation to ensure that development can respond to market demand. We strongly support the preferred option of supporting new employment uses through intensification at existing employment sites and sites specifically allocated for employment uses in the plan. This option would not allow any new employment-generating uses outside of these locations and we support employment needs being directed to existing employment sites.	Support noted.

E1	Support – ARC Oxford	We support the preferred option to attempt to meet employment needs, while balancing other uses, in particular housing. We consider that designated employment sites, such as ARC, are the best locations to support intensification of employment uses to meet employment needs. We support the preferred option of seeking to meet employment land needs through appropriate modernisation and intensification of the city's existing employment site network, which would include ARC. Supporting modernisation and intensification of the city's key employment sites will enable employment land needs to be met on existing	Support noted. Support noted. Support noted.

Draft policy	Topic	Summary of comments	Response

		sites through a mixture of refurbishment of existing buildings and new build development. RLMIS has no plans at this time to deliver housing on its site at ARC, but recognises housing is a key locational consideration for companies. There could be scope for allowing some housing on employment sites provided it supports their economic function. Where there is scope to deliver housing on other key employment sites in the City, we support the preferred option to allow an element of housing delivery on existing employment sites (subject to other policy requirements being met). We strongly support the preferred option of supporting new employment uses (through modernisation and intensification) at existing employment sites and sites specifically allocated for employment uses in the plan only. This option would not allow any new employment generating uses outside of these locations and therefore support employment needs being directed to existing employment sites, such as ARC Oxford.	Conditional support noted. Support noted.
E1	Support for policy	The [OUH] Trust supports Policy E1, and the continued identification of its hospital sites as 'Key Employment Sites' at Appendix 3.1.	Support noted.

Draft policy	Topic	Summary of comments	Response
		The aspiration to protect and make the best use of existing employment sites is a particular positive for the Trust given the importance of the three hospital sites to the city in terms of the number of people employed and the services provided.	Support noted.
E1	Support – Suggested wording	It is supported that emerging policy E1 considers new employment generating uses within the city centre as an acceptable location for delivering new, modernised and intensified employment floorspace. It is suggested with respect to the initial paragraph of the draft policy that it is updated to ‘All new development for employment purposes...’ as opposed to ‘All new development on employment sites’. It is understood that the sentiment of the first paragraph is applicable to employment development more broadly rather than only being applicable to allocated/existing employment sites. This clarification and amendment would ensure the policy is effective.	Support noted. The city’s employment sites include hospitals, teaching and research campuses, and sites allocated for a range of employment generating uses. It is important that the key principles outlined in the first paragraph of Policy E1 are applied uniformly across the city’s diverse network of employment sites rather than restricting their application to development for “employment purposes” (an undefined term).

E1		The Group supports the flexibility in the draft policy, which protects the most important 'key' employment sites, whilst also allowing for their intensification including complementary housing to create mixed use sites.	Support noted.

Draft policy	Topic	Summary of comments	Response
		Given the scale of the City's housing requirement, it is right that all options should be considered, including employment sites. However, in those circumstances where employment sites (either in whole or part) are given over to other uses, it is essential that there remains sufficient employment land for the economic potential of Oxford to be fully realised.	The policy includes criteria to ensure that, even where a loss of employment floorspace is proposed at Key Employment Sites, the employment use can be retained and the number of jobs in employment generating uses are retained.

E1	Greater flexibility needed to align with NPPF	The Universities welcome the latest evidence presented in the ‘Oxford City – Employment Land Needs Assessment Interim Report’ (June 2025), which is generally more aligned to the data submitted within the Universities’ representations during the last round of planmaking. However, the Universities consider that greater flexibility is needed on the list of permissible locations for new employment uses and clarification is needed on what defines an ‘employment site’. Currently, the preferred options for Policies S1 and E1 collectively seek to direct new employment land to existing employment sites whilst prioritising housing elsewhere. However, in the absence of a definition of ‘employment site’, the policy poses a potential	Noted. Given the city’s well-publicised inability to meet housing need (standard method, NPPF, Dec 2024) and widely acknowledge barrier to economic growth that this brings, coupled with the very healthy “demand-led”

Draft policy	Topic	Summary of comments	Response

		barrier to the development of employment uses on certain redundant brownfield sites which may lend themselves to employment-generating uses. Furthermore, the Universities consider that in their current guise, Policies E1 and S1 risk conflict with the overarching vision of the Local Plan to support Oxford's international standing for research and development. Reflecting Paragraph 68 of the NPPF ("the Framework"), which required policies to be "be flexible enough to accommodate needs not anticipated in the plan", it is suggested that a sequential approach could be added to the policy, to enable new employment generating uses where they would not undermine other priorities of the plan.	employment land supply position puts the city in a strong position to meet all identified employment land needs in the plan-period. The plan's strategy to support new sites for housing is therefore critical to the further economic success of the city. The Reg. 19 plan will provide clear definitions of employment sites and appropriately sub-categorise them. While supporting Oxford's key economic strengths forms part of the overarching vision for the plan, delivering new homes in the city is a key priority as well. Given the brownfield and strategic greenfield opportunities that remain undeveloped across the city's network of Key Employment sites, we consider there is sufficient flexibility to accommodate any employment needs not anticipated by the plan. However, as stated previously, as Oxford is unable to meet currently identified housing need, the plan's overarching strategy (S1) and employment strategy (E1) provide clear support for economic growth by seeking to reduce its barriers, which include housing affordability issues. Noted – see above.

Draft policy	Topic	Summary of comments	Response
		Whilst this option is not considered within Background Paper 004, such an approach would achieve an appropriate balance between land use pressures, ensuring the Plan conforms to the Framework.	
E1	Support draft policy preferred option over alternatives.	The policy is supported. Although the policy appears to be supportive of a range of employment land uses, it doesn't reference the nature/type of acceptable uses and should ensure that it is responsive to market demands to allow for the delivery of employment types in accordance with the needs of the local market.	The policy supports "employment generating uses" defined in the appendix. A specific policy is included for B8 uses as these often have bespoke requirements/ needs etc.

E1	Clarification suggested	Policy E1 seeks to support and protect employment uses. However, it supports the loss of employment uses on sites that are not designated for employment uses, and where housing is proposed. It also supports the provision of housing on designated sites, taking a balanced judgement approach where the employment function of the designated site is not harmed. In both these circumstances it would be helpful if the policy said that student or co-living types of housing are supported. Both types meet housing needs (in terms of the NPPF and NPPG), and it might be that such housing types are	Noted. Noted. Policy E1 does not specify the type of residential development that should be come forward. As the acceptable locations for student housing are covered elsewhere in the plan, it would not be appropriate to support them at all employment sites. The policy therefore provides a general support for residential development and does not specify precise types.

Draft policy	Topic	Summary of comments	Response
		more appropriate alongside employment uses than conventional housing.	

E1	Policy should go further	We welcome the proposed more flexible approach to the use of employment sites for housing, but as indicated above in relation to policy H1, we think this could go further. The policy should explicitly recognise that creating new employment opportunities also creates additional housing need that cannot be accommodated within the city, adding to congestion and carbon emissions. The city already has significantly more jobs than residents of working age so the provision of new homes should be prioritised over employment.	Support noted. This Local Plan uses the Government's Standard Method (NPPF, Dec 2024) to calculate housing need. The plan does not allocate any additional sites for employment purposes. The plan's strategy seeks to promote housing and limits new employment generating uses to existing employment sites, the city and district centres and sites in lawful use for the proposed employment use class.
E1	Objection	The policy is unjustified as there is no provision for extra employment to provide extra housing, only permission to do so. The relentless expansion of the OUHT, the Universities and associated research centres is the primary driver of housing need in the city, but E1 permits expansion with no contribution to housing. If a business wants to downsize and allocate space for housing, this is specifically prohibited, which is unjustified.	The policy sets out a permissive approach to housing delivery across the city's employment site network. Where relevant, site allocation policies provide minimum housing numbers. Policy E1 allows the loss of "existing employment sites not designated as Key Employment sites" to other uses, while actively supporting their loss to housing. Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
		Work from Home leads to reduced need for space with different workgroups having office days on different days of the week. This is an economic decision taken by the employer. OCC has no role in this.	While it is noted that working from home can reduce premises needs for certain sectors, other sectors (e.g., manufacturing/ research & development often cannot operate successfully without the workforce being present on site.
E1	Policy as written not effective	Hallam does not support the proposed employment strategy due to its failure to identify clear requirements for employment land and how or where needs will be met. The preferred option is based on a criteria-based approach that seeks to focus and intensify development at existing employment sites and city and district centre locations whilst resisting development resulting in the loss of floorspace at key employment sites. A more effective employment land strategy is required. It should quantify employment land and floorspace requirements, express the spatial priorities where provision can be made and ensure flexibility for the market and growth in current and emerging sectors.	Employment land needs evidence will be consulted on at the next statutory consultation stage (Reg.19). Noted. The City Council is confident that the employment land strategy, which supports the modernisation and intensification of existing employment sites will be sufficient to meet identified land needs and ensure flexibility for market growth in current and emerging sectors, while addressing key barriers to economic growth, i.e., lack of housing and infrastructure.

E1	Suggested amendment	CPRE have repeatedly called for some development on various sites listed as Key Employment Sites many of which have sat empty for decades.	Noted.

Draft policy	Topic	Summary of comments	Response

		The worst examples, being the Osney Industrial Estate and the Unipart site but there are many others. For example, there are still empty sites available on the old British Leyland site at ARC Oxford dating from the 1990's and representing now 30 years of being effectively Brownfield sites. If there is no real expectation that these sites will be actively developed, then protecting them as Employment sites makes no sense. The City Council have singularly failed to deal with this issue claiming quite wrongly that Oxford is full. ignoring Osney Mead and the many other vacant sites in Oxford. In CPRE's view the draft Policy should state that: <i>"if a site or part thereof has not been used for substantive employment purposes for a period of 10 years or more then it shall not be subject to the Proposals involving housing listed in the Employment strategy and be subject to normal planning requirements for housing development. Car or commercial vehicle storage/ parking would not be regarded as substantive employment. In relation to smaller</i>	Neither Osney Mead Industrial Estate nor the "Unipart" site, are completely vacant. Both are long-standing site allocations and are actively in use for a range of employment purposes. There is 3ha of vacant land at ARC Oxford (without planning consent). Discussions with all landowners suggest that they are keen to bring forward development at their sites within the plan period. We do not accept this modification. Storage and distribution uses are a recognised employmentgenerating use under the Use Classes Order. The plan provides a permissive approach to housing on employment sites. Preferred Option selected for reasons set out in Background Paper.

Draft policy	Topic	Summary of comments	Response
		<i>developments (formerly Category 3 sites) the suggested proposals should not apply.”</i> Further owners should pay enhanced business rates if they fail to redevelop vacant sites.	

E1	Clarification sought.	Draft policy allows for housing to be supported on employment sites where the objectives of the policy are met. Policy E1 differs from that in the adopted local plan (and previous 2040 plan) in that it only proposes two categories of employment site – Key Employment Sites and non-designated employment sites. However, there appears to be no mechanism in the LP42 to change category outside of a review of the Local Plan. It is therefore suggested that a mechanism is provided in the LP42 to review the categorisation of employment sites on an annual basis and update the list within Appendix 3.1 of the Plan. Conflict between the wording in the policy - states that “planning permission will be granted for the loss of any non-designated employment sites to other uses, proposals for housing will be supported” and the section relating to housing which sets out a number of criteria to meet where housing is proposed, including –	Noted. That is correct. As part of the plan-making process, existing employment sites (over 0.25ha) were assessed against specific criteria. We do not propose to undertake this assessment annually. We do not consider that this is a conflict. The policy is clear that for existing employment sites not designated as Key Employment Sites, that housing, in principle will be supported, however, the objectives set out parts c)h) of the policy need to be assessed by the decisionmaker.

Draft policy	Topic	Summary of comments	Response

		“avoiding the loss of or significant harm to, the continued operation or integrity of successful and/or locally useful, business and employment sites”. Who determines the above is also a concern, as all employment sites are locally useful? These conflicts should be clarified.	Preferred Option selected for reasons set out in Background Paper.
E1	Support	Support identification of ARC Oxford as a ‘Key Employment Site’ (Appendix 3.1)	Support noted.
E1	Wider contextual comment	Oxford remains the most sustainable location for employment in the county. The continued intensification, regeneration and modernisation of ARC Oxford can meet that demand and support local, regional and national economic growth.	Support noted.
E1	Housing on Employment sites	ARC does not object to the newly introduced principle that housing (in the future, where justified) could be realised on the site.	Lack of objection noted.
E1	Other uses	In addition, ARC would support hotel or aparthotel uses.	Site allocation policies will set out appropriate uses for each site.
E1	Employment land needs	Get out of the property market.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Within the preferred option, require a clause to re-categorise existing commercial land to housing land or mixed use	Policy E1 enables housing to come forward at existing employment sites. Preferred Option selected for reasons set out in Background Paper

E1	Employment Land Needs	Alternative Option 1 preferred Reasons include:	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
		- Employment drives prosperity which in turn will support housing and taxation - The market should have more flexibility in determining the most appropriate uses that meet market dynamics at the time of development - being over prescriptive may impact the delivery of any type of development.	

E1	Employment Land Needs	Request Alternative Option 1 is progressed to ensure employment needs are fully met within Oxford. Alternative Option 1, focusing on meeting all identified employment land needs within Oxford's boundary, is essential to sustaining the city's economic vitality and supporting its key sectors, particularly research and development, life sciences, and advanced manufacturing. The preferred option, which prioritises other uses such as housing even where employment needs cannot be fully met, risks undermining Oxford's long-term economic resilience. While we recognise the acute need for housing, this should not come at the expense of employment land that is critical to the city's innovation ecosystem and broader regional economy.	The lack of housing (and infrastructure) has often been cited as a barrier to economic growth in Oxford. The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs). Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response

		Alternative Option 1 offers a more balanced and proactive strategy. By actively investigating ways to meet employment land needs within the city, including the identification of new, appropriately located sites, it ensures that Oxford can continue to support high-value job creation, attract investment, and retain its competitive edge.	
E1	Employment Land Needs/ Best use of Employment sites	Alternative option 1 seems to provide some solutions. Given that working from home is so common nowadays, it is hard to understand the employment land needs in Oxford. Plus, lots of shops move to online, the council may consider how to maximise the use of unoccupied office sites. to balance such needs.	Preferred Option selected for reasons set out in Background Paper. While working from home has become more common for certain sectors (e.g. traditional office workers), the type of employment land coming forward in Oxford (e.g., R&D), often requires the workforce to come into the workplace on a regular basis.
E1	Employment Land Needs	Support Alternative Option 2: (10) Reasons include: - It is more likely to succeed in the long term. - Councils have a poor record of decisionmaking in this area. - Stop intervening, let the market find the right balance. - Let the market decide the most appropriate employment land - Don't over-manage, let a thousand flowers bloom.	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
		- Option two based on the existing framework is sufficient - Long live the market!	
E1	Employment Land Needs	At present housing is the important thing but there should be no strict rule here. Helping the economy expand is important as well.	The policy supports the economy by not allocating new additional sites in employment-generating uses and allows employment sites to modernise and intensify to support the expansion of floorspace, without impacting further on Oxford's limited land availability.
E1	Employment Land Needs	I don't like the increase in business and science parks around the edge of the city. They should be better integrated with some kind of local infrastructure, including housing.	Re: infrastructure - The plan supports the re-opening of the Cowley Branch Line to passenger services, which has recently (October 2025) been provided with £120m of Government funding to support it. New homes are proposed as part of strategic site allocations in neighbouring authorities to meet previously agreed unmet housing need.
E1	Employment Land Needs	I don't really know what this means. We should be encouraging employers to locate in oxford, especially small business, entrepreneurs, and transforming the city centre from the tourist shop and takeaway desert it is now to a mosaic of independent shops.	The Reg.18 Plan included draft Policy E4 which is designed to support affordable workspaces for certain sectors. While Policy E1 itself supports a range of uses within the city and district centres.

E1	Employment Land Needs	I think a joint up approach is needed. We need jobs to contribute to public finances as well as good and safe housing.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Prioritising housing on employment sites will slow and complicate decision making around the evolution of employment in the city; which is tending towards densification, higher value uses,	The plan's strategy does not seek to prioritise housing on employment sites but rather to prioritise any new site allocations to support housing delivery. The Employment Strategy supports the modernisation and

Draft policy	Topic	Summary of comments	Response

		and R&D, often in uniquely suitable locations for this sort of economic growth. Adding the need to consider housing into decision making on the future needs of employers is unnecessary. In the past the City has co-operated with Cherwell on unmet housing needs. This will hopefully continue, but there is also an opportunity to co-operate on employment needs. For example, the Science North area, stretching from Oxford North and Oxford Parkway, through the University of Oxford's Begbroke Science Park, Oxford Technology Park and London Oxford Airport, is emerging as a strong rival to Science Vale in the south and as a further link along the Knowledge Spine stretching from Didcot to Bicester. There is, moreover, 4,400 homes for Oxford's unmet need committed in this location. In our Opinion, the spatial strategies in the Oxford Local Plan need to connect with and plan for Science North. This will provide for the housing and employment needs of the City, set a plan for the related infrastructure, all in a highly sustainable and market-aligned way. For example, Bloombridge is planning to submit the application for Phase 2 of Oxford	intensification of the city's larger "Key Employment Sites". Where losses of employment floorspace are proposed on "Key Employment Sites" certain criteria need to be met, while the loss of non-designated employment sites to other uses is allowed, Policy E1 supports housing at these sites. The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs). Economic Evidence will be published at next consultation stage (Reg. 19) to confirm. Re: "Science North" - this is outside the city boundary and should be supported by appropriate infrastructure. The County Council is currently responsible for developing active and sustainable travel schemes and they should be involved with regards to any infrastructure linkages.

		Technology Park within the next 6 months - comprising	

Draft policy	Topic	Summary of comments	Response
		approximately 90,000 sq m of technology, quantum and life sciences space, linked to the City via the excellent public and accessible transport infrastructure in this area.	
E1	Employment Land Needs	Employment and housing should be equally prioritised as they go hand in hand Surely employment and housing provision are two sides of the same coin? Situations where mixed use if the appropriate solution?	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs). Mixed-use sites will be appropriate in certain locations (e.g., city and district centres) Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	The University assumes that more is better, but in fact standards are slipping in some areas in the face of an obsession with growth.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Agree that priority should be given to the communal and social needs first, such as good housing and access to green spaces and community spaces.	Support Noted.
E1	Employment Land Needs	There's no point creating more employment if so many employees have to live outside Oxford.	Preferred Option selected for reasons set out in Background Paper

E1	Employment Land Needs	Revise ideas for the Oxpens site in order to conform to this draft policy. Eg priority throughout this area for council/keyworker/self-	Having regard to national policy, the city and district centres are suitable for a wide range of uses including employment, retail, hotels and residential uses.

Draft policy	Topic	Summary of comments	Response
		build homes from existing empty built environment including above commercial units.	Preferred Option selected for reasons set out in Background Paper

E1	Employment Land Needs	Oxford's global research clusters depend on a steady pipeline of modern labs, offices and light industrial floorspace. Consciously favouring housing over employment whenever a trade-off arises would push high-value firms further from the city, lengthen commuting and erode the very wage growth that underwrites local prosperity. The draft Plan itself notes that demand for R&D space is "being delivered at pace" and already commands premium rents city-wide; constraining supply will only magnify that pressure. The evidence base also recognises that existing employment sites can be "intensified significantly" and that brownfield retail parks such as Botley Road are naturally converting to laboratories under the new Class E rules. Rather than ration floorspace, the pragmatic course is to keep policy flexible: encourage vertical extension, allow mixed-use redevelopment of low-density plots, and let new sites come forward wherever they satisfy environmental and transport criteria.	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment needs). Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response

		Alternative 2 does exactly that. By relying on clear, city-wide design standards and the normal NPPF tests, while lifting blanket locational bans, the Council can accommodate both jobs and homes, letting price signals direct land to its highest-value use. In a space-constrained city, the surest route to inclusive growth is to remove bottlenecks, not choose winners.	
E1	Employment Land Needs	I am not sure of the merits or otherwise of prioritising housing over employment needs. I would have thought it was important for employment to be available for people who live in the city but am not sure how these priorities interact.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	I don't think we need more employment at all. Oxford does NOT need growth, but it does need accommodation for those who are already here.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	This seems rather vague. Employment has been prioritised over housing over recent decades leading to significant proportion of workers commuting from well beyond Oxford boundaries.	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment needs). Preferred Option selected for reasons set out in Background Paper

E1	Employment Land Needs	Note explicitly the need for the provision of housing to outpace the growth in housing	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
		demand stimulated by new or densified commercial development.	
E1	Employment Land Needs	Put employment elsewhere where it is needed	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	We support the preferred option. We were pleased to see that this policy reflects the need for housing in Oxford to catch up with job provision.	Support noted.

E1	Employment Land Needs	Increasing housing stock must be prioritised above developing new employment sites. Otherwise, planning policy will exacerbate the number of workers forced to live outside the city due to unaffordable housing. Although we welcome a more flexible approach to using employment sites to help deliver new housing, the provisions in Policy E1 and Appendix 3 remain overly restrictive. They offer only limited flexibility and continue to place excessive emphasis on maintaining high levels of employment. We encourage the council to monitor the job-tobed ratio in the city and set out a plan and policies aimed at narrowing this gap.	Policy E1 does not allocate new employment sites and supports the modernisation and intensification of existing employment sites. It is important to protect Key Employment sites as they include a range of sites that support both the local and national economy. A monitoring framework will be produced to support the plan.
E1	Employment Land Needs	There is no employment crisis in Oxford. Please take great care to prioritise housing where sustainable sites for increasing employment are proposed, instead of job-creation: 55,000 new	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas able to meet employment needs).

Draft policy	Topic	Summary of comments	Response

		workers can never be housed in the City and will simply make any lack of housing worse. I am opposed to calling on surrounding councils and green belt to take on construction projects to accommodate something that Oxford should not entertain.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs/ Best use of employment land	Expansion of or acquisition of sites for conversion to education purposes should be expressly considered as employment uses	Local Plan already contains separate policies relating to academic institutions. Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	There is no point building more and more dwellings if there's nowhere for more and more people to work.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Allowing 'brownfield sites' for housing is eminently sensible.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Support Preferred Option Reasons provided include: - To ensure a higher level of protection to employment sites, unless these sites are demonstrably poorly performing. - Yes, modernisation and retrofitting of existing spaces, and not using more land for employment purposes. - Oxford should concentrate protection on the core campuses and business parks that anchor its life-science and	Preferred Option selected for reasons set out in Background Paper

		advanced-manufacturing clusters, while	

Draft policy	Topic	Summary of comments	Response

		allowing tired, low-density sites in secondary locations to switch to highvalue uses; doing so unlocks land for much-needed homes, channels investment into modern multi-storey labs on the key sites, and prevents an inefficient blanket freeze that would trap obsolete sheds and offices in perpetuity—thereby maximising both job creation and housing delivery within the city’s tight boundary. - I think important employment sites should be protected. - Support preferred option which focuses on increasing employment locations only through intensification and modernisation of existing sites. - I agree with allowing/ changing the loss of poorly performing sites to other priority uses e.g., housing. For example, the much-missed Co-operative Bank has been an eye-sore since before the pandemic.	
E1	Best use of employment sites	Support rely solely on national planning policy.	Preferred Option selected for reasons set out in Background Paper

E1	Best use of employment sites	I disagree with all the options. More employment and growth is not going to benefit the life of those already in the city.	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
E1	Best use of employment sites	Be flexible. Employment matters too	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	There is very little unemployment in Oxford.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	We note our concern that even intensification could lead to increases in housing need and thus add further pressure to the city's housing provision.	Housing need calculations are based on the Government's Standard Method (NPPF, Dec 2024). Preferred Option selected for reasons set out in Background Paper

E1	Best use of employment sites	Draft Policy E1 sets out clear support for the intensification and modernisation of both Key Employment Sites and any other employment sites where the site is located within a district or city centre. It is recommended that a higher level of protection be afforded to existing employment sites to prevent change of use unless there is robust evidence provided to demonstrate that it is poorly performing in employment use. Wording should also be included which allows for the redevelopment of employment sites for suitable employment uses.	Noted. All employment sites over 0.25ha were assessed and the Key Employment Sites were selected where they scored well against the assessment criteria. Policy E1 already sets out a higher level of protection for Key Employment Sites. Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	The city should divest its property holdings.	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
E1	Best use of employment sites	Agree, take initiative to protect employment, do not rely on national initiatives alone.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Any opportunity to change to housing from commercial use should be taken.	Preferred Option selected for reasons set out in Background Paper

E1	Best use of employment sites	I think changing employment sites to housing is fine if the market supports that	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Always consider impact on existing communities.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Encourage working from home where possible to make room for housing	The type of employment floorspace coming forward (i.e., R&D), often requires the workforce to come into the workplace rather than being able to work from home. Also, Different organisations have different work from home policies. Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	What grieves me are the number of exceedingly ugly building such as the large structures in Speedwell Street or the intrusive Oxfordshire County Council offices which do not reflect the character of the city.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	The currently adopted Local Plan classifies the MINI Plant as a Category 1 site, and it is noted that the 2042 Preferred Options consultation	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response

		document has maintained and streamlined this classification of the MINI Plant into simply a “Key Employment Site”. It is essential that manufacturing uses at the MINI Plant continue to receive this highest level of policy protection to enable the company’s operations to expand and modernise within a stable policy environment.	
E1	Housing on Employment sites	Support Option 1	
E1	Housing on Employment sites	Support Alternative Option 1 Reasons provided include: - Housing is a crisis at present - If there is a greater need for housing, then let it be built on employment sites. There’s no point in maintaining places of employment if people don’t have places to live. - it will help preserve existing employment sites. - Housing would not be an appropriate use at the MINI Plant given its manufacturing use. - We support principle of allowing housing delivery on employment sites provided that other policy	Preferred Option selected for reasons set out in Background Paper

		considerations are met. We would go further to say that this	

Draft policy	Topic	Summary of comments	Response
		should be encouraged to ensure a mixed use of sites.	
E1	Housing on Employment sites	Housing should be secondary to employment. Housing can be anywhere, does not need to be ring-fenced where employment is.	Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	The city shouldn't be able to allow as it shouldn't be in the property market.	Preferred Option selected for reasons set out in Background Paper

E1	Housing on Employment sites	Bring it on!	General comment/ statement. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Yes...appropriate mixed use	Preferred Option selected for reasons set out in Background Paper
E1	Housing on employment sites	Does not specifically allow an element of housing delivery on existing employment sites	Preferred Option selected for reasons set out in Background Paper
E1	Housing on employment sites	It depends a bit how close any potential residential units will be to suitable infrastructure (shops, public services, transport etc.).	Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Evaluate each employment site to determine if it is beneficial to local people. Cultural centres should not be focused as an easy route to housing just before their income is not as excessive	Employment sites over 0.25ha were all assessed against set criteria including specific local objectives. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	I think this [<i>housing</i>] should be required not just allowed.	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
E1	Housing on Employment sites	Densification for housing seems to be a solution where 4 or 5 story flats that don't interrupt the skyline can be built in areas of	Policies that set out appropriate residential densities are included elsewhere in the plan. Preferred Option selected for reasons set out in Background Paper

		existing employment sites - and in city centre sites.	
E1	Housing on Employment sites	It is recommended that all Key Employment Sites are protected from policy driven inclusion of residential development, unless it can be demonstrated that this residential development does not impact the role and function of the key employment site. The priority should remain modernising and intensifying in line with the existing employment use.	Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Some sites which are currently in commercial use e.g. the retail parks off the Botley Road, and the Osney Mead industrial state, should be allocated by the council entirely for housing, ideally affordable housing. Developers (including the university and colleges) should NOT be allowed to build yet more labs on these sites. Such commercial developments potentially provide more jobs (for the university) but do not address the problem of where those workers are to live. Most people (particularly young people) can't afford to live in Oxford, so they are forced to live outside and to commute in, adding to traffic problems in and around the city.	Preferred Option selected for reasons set out in Background Paper Permitted development rights already exist to support the conversion of these spaces to residential.

		Additionally, there should be an active policy to turn currently empty spaces above shops in the	

Draft policy	Topic	Summary of comments	Response
		city centre into affordable living accommodation for citizens (not university students).	

E1	Housing on employment sites/ Location of new employment uses	Protection of mixed-use sites (e.g. Retail, restauration) as well as residential sites from conversion to hotels Expansion of or acquisition of sites for conversion to education purposes should be expressly considered as employment uses and should not be permitted if it results in loss of residential dwellings of any size.	Policy E5 deals with hotel and short stay accommodation. Local Plan already contains separate policies relating to academic institutions and includes a policy to prevent the loss of dwellings. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	If employment land is able to accommodate labs and other employees with regular use within flood risk areas, want to see this land available for allocation to housing as well.	Plan includes separate policies to govern appropriate development in flood risk areas, supported by national policy. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Please reject construction on Oxford's flood plain.	Plan includes separate policies to govern appropriate development in flood risk areas, supported by national policy. Preferred Option selected for reasons set out in Background Paper
E1	Location of New Employment	Reasons provided include: - may attract new SMEs and the creative economy.	Preferred Option selected for reasons set out in Background Paper
E1	Location of New Employment	Support Alternative option Reasons provided include: - Less rigid - allows for a plan-led, limited, and strategic release of new employment	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
		sites without compromising the protection of existing housing land. This strikes a more effective balance between competing land-use pressures. - The market should have more flexibility in determining the most appropriate uses that meet market dynamics at the time of development - being over prescriptive may impact the delivery of any type of development. - It is important not to hamper Oxford's thriving economy by making employment creation difficult. - seems okay too but am not an expert on employment sites.	
E1	Location of New Employment	Rely solely on national policy Reasons provided include: - Simpler - Let housing and employment coexist /exist freely, as needed, wherever needed. - Don't interfere or intervene. Let the market decide. - We shouldn't be adding more restrictions	Preferred Option selected for reasons set out in Background Paper

E1	Location of New Employment	If the preferred option went ahead, provisions for transport links to these sites might need to be considered.	Preferred Option selected for reasons set out in Background Paper.

Draft policy	Topic	Summary of comments	Response
E1	Location of New Employment	Judge each case on its merits. Generally, the principle is ok - but not to be followed slavishly.	Preferred Option selected for reasons set out in Background Paper

E1	Location of New Employment	Oxford's economy is dynamic and rapidly evolving, particularly in sectors such as life sciences, research, technology, and advanced manufacturing. A more flexible policy that enables some employment development outside of currently designated sites will allow the city to respond to emerging opportunities and market demands, especially where existing sites may be constrained or nearing capacity. Permitting new employment uses adjacent to existing employment sites allows for logical and coordinated expansion of successful clusters (e.g. near hospitals, science parks, or research campuses), where businesses benefit from agglomeration, infrastructure, and workforce proximity. Allowing new employment sites to come forward as part of mixed-use developments, including residential, is consistent with national planning principles and Oxford's broader sustainability objectives. This supports walkable communities, reduces commuting distances, and makes more efficient use of land.	Policy E1 supports the expansion of successful clusters through modernisation and intensification of employment-generating uses at existing sites, supported by any necessary infrastructure. Preferred Option selected for reasons set out in Background Paper.
Draft policy	Topic	Summary of comments	Response

E1	General comments	A flourishing oxford economy needs to allow new businesses and employers find new sites for competition. I do not support new employment sites before housing, and I do not support ANY new employment sites in the city centre. No loss of housing to accommodate commercial use should be allowed - even in the centre. The MINI Plant is suitable for new employment uses that supports its primary manufacturing use. Don't build in Green Belt	Preferred Option selected for reasons set out in Background Paper
E1	Criteria based approach to employment	A blanket rule that confines all fresh employment floorspace to current sites and city/district centres "planning permission will not be granted ... outside of these locations" ignores Oxford's acute shortage of modern lab and office space, already driving premium rents in every quarter of the city. Allowing wellconnected plots immediately adjacent to key campuses to come forward (and, where viable, pairing them with housing) would expand capacity, shorten commutes and curb price inflation without sacrificing existing dwellings. A criteria-based green light at the margin is far more pro-growth than a hard red line.	A significant pipeline of Research and Development (R&D) space is coming being delivered in the city. Significant floorspace already has permission/ is under construction. This is all on existing sites/ within the city and district centres and through lawful changes of use within Use Class E. Preferred Option selected for reasons set out in Background Paper

Statutory Consultee Responses – Draft Policy E1

Cherwell District Council

Draft Policy	Summary of comment	Response	Outcome
2047 E1	The policy says new employment generating uses will be acceptable only on exiting employment sites and the city and district centres, but says that outside of these locations non-designated sites can only be regenerate for employment purposes if certain criteria are met. B8 uses are not always regarded as the most appropriate use within the city. The approach set out should be reviewed so that the policy can reflect the emerging and future assessment of need for such uses, rather than to try and impose this restrictive approach.	This is not the intention of the wording, which will be reviewed. We are not quite sure what is being asked for in terms of B8 uses. Our evidence base demonstrates that there is limited demand for these uses in the city because there are not suitable sites- they are generally too high in value and they are not on the strategic road network and they are too small. A policy approach that requires sites to remain in this use or new sites to come forward for this use as opposed to other uses such as housing does not seem a sensible approach and we're not entirely sure what is intended with this suggestion.	Tweaks have been made to the policy wordin to add clarity.

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy	Summary	Response	Outcome
Draft Policy E1	Concerned that the ELNA shows that draft policies will result in wider economic impacts on the Oxfordshire economy. It is not clear how key employment sites were identified. More information, including criteria, is needed in the background paper.	ELNA looks at Oxford's city's land needs only, which creates the conditions to meet Oxford's identified land needs within the city. The employment sites were assessed using specific criteria.	We will be publishing the methodology for identifying Key Employment Sites in a Background Paper at Reg. 19 stage.

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome

2048

E1 2049	Strategic Planning Re: loss of non-designated employment sites to housing: Policy E1 is not clear in that the approach should be for housing first and other non-employment uses second. Although housing in sustainable locations must be the focus, the policy as worded could result in land-use conflicts and loss of employment, which is still important for the City. Therefore careful consideration must be given to this policy. In addition, infrastructure demands from new housing on these formerly employment locations need to be taken into account and mitigated by these new housing developments, where the County Council's expectations are that these become highly	It will be for landowners to decide whether further employment uses, or an alternative use is proposed at a nondesignated employment site. The plan sets out that housing would be supported at non-designated employment sites (subject to the policy criteria). Noted.	Overall, editorial changes to Policy E1 aid its legibility and clarity. These changes have regard all comments made by the County Council, in particular, those from the County

Draft Policy	Summary of comment	Response	Outcome

2050	sustainable, net zero ready and adequately serviced housing developments. We welcome future conversations with the City Council to assist in the drafting of the wording for this policy as the current criteria include matters of particular interest to the County Council such as being well connected to public transport and active travel opportunities. Place Planning and TDM (Central) Linked to comment at draft policy S3 - new employmentgenerating uses and intensification of existing sites, coupled with low car parking, will increase demand for P&R, as well as bus and rail. County Council Property and Estates Team Oxfordshire County Council Property and Estates Team notes that this draft policy currently categorises employment sites into three categories: 1) Key Employment Sites; 2) Employment sites located within a city or a district centre; and	We will maintain a dialogue with the county on relevant matters. Noted. The City Council considers that two categories of employment sites exist. Designated sites and nondesignated sites. Sites located in the city and district centres are generally non-	Property and Estates Team.

Draft Policy	Summary of comment	Response	Outcome

2051

2052	3) Non-designated employment sites Oxfordshire County Council Property and Estates Team supports the objectives of this draft policy as a whole, although it is considered that it is restrictive and lacks the inclusion of a proportionate element that is required to enable sustainable development. The second paragraph of this draft policy states: <i>“The only locations that are suitable for new employment-generating uses are existing employment sites and the city and district centres. Planning permission will not be granted for proposals for employment-generating uses outside of these locations.”</i> First, this paragraph introduces a new category of employment sites other than those listed above, which are the “existing employment sites”. Oxfordshire County Council Property and Estates Team considers that for the sake of improving clarity, this should be replaced with either “Key Employment Sites” or specified that this part of the draft policy refers to existing employment sites within the city and district centres.	designated employment sites and do not need their own specific designation. Noted. Noted. As the plan introduces no new employment site allocations, all employment sites (both “key” and “nondesignated” are existing employment sites.	

Draft Policy	Summary of comment	Response	Outcome
2053	Second, the second part of this draft policy is considered to be quite restrictive and onerous, as it fails to take into account the proportionate element of a development proposal. Paragraph 86 (e) of the NPPF highlights that planning policies should be flexible enough to accommodate needs not anticipated in the plan in response to changes in economic circumstances. It is the view of Oxfordshire County Council Property and Estates Team that this part of the policy should be revised to state that: <i>“Planning permission will not be granted for <u>Development proposals for employment-generating uses outside of these locations will not be supported, unless they are in accordance with the development plan as a whole and it can be</u></i>	The city and district centres are appropriate locations for new employment-generating uses. As such, we do not wish to restrict new employment-generating uses to existing employment sites within these accessible locations. Policy E1 is aligned with the plan’s overarching strategy which supports housing delivery. Emerging evidence shows that the city’s employment land needs can be met wholly on existing	

	<i>demonstrated that...” (include criteria mentioned in fourth paragraph of this draft policy text)</i> Equally, the first part of the fourth paragraph states: <i>“Planning permission will only be granted for the intensification and modernisation of all other employment sites where that site is located within the city or a district centre.”</i>	employment sites. As such no new site allocations are needed. New employment-generating uses can therefore come forward at existing sites or on sites within the city and district centres.	

Draft Policy	Summary of comment	Response	Outcome

2054

2055	Oxfordshire County Council Property and Estates Team considers that planning permission should not automatically be granted for employment development within these locations, as they could conflict with other policies of the development plan. Accordingly, Oxfordshire County Council Property and Estates Team considers that the wording should change to demonstrate that these types of proposals will be supported. Paragraph 6 explains that development proposals seeking the net loss of employment floorspace on Key Employment Sites will not be granted planning permission, unless the number of jobs in employment-generating uses is retained and the employment use can be maintained. Oxfordshire County Council Property and Estates Team considers that this part of the draft policy, as it is currently drafted, lacks the appropriate clarity that would enable development proposals to achieve sustainable development. Oxfordshire County Council Property and Estates Team is concerned is that using the number of jobs that will be retained to assess development proposals is not appropriate, as different economic circumstances apply to small, medium	The proposed amendment weakens this position and potentially undermines the city's ability to deliver homes. This paragraph does not automatically grant planning permission, instead it sets out that the principle of intensification and modernisation is acceptable in this location. Other policies in the plan specifically deal with other requirements (e.g., net zero, urban design, heritage etc.). These all need to be taken into account when coming to a decision. Noted. As Key Employment Sites are larger sites (over 0.25ha), this policy would	

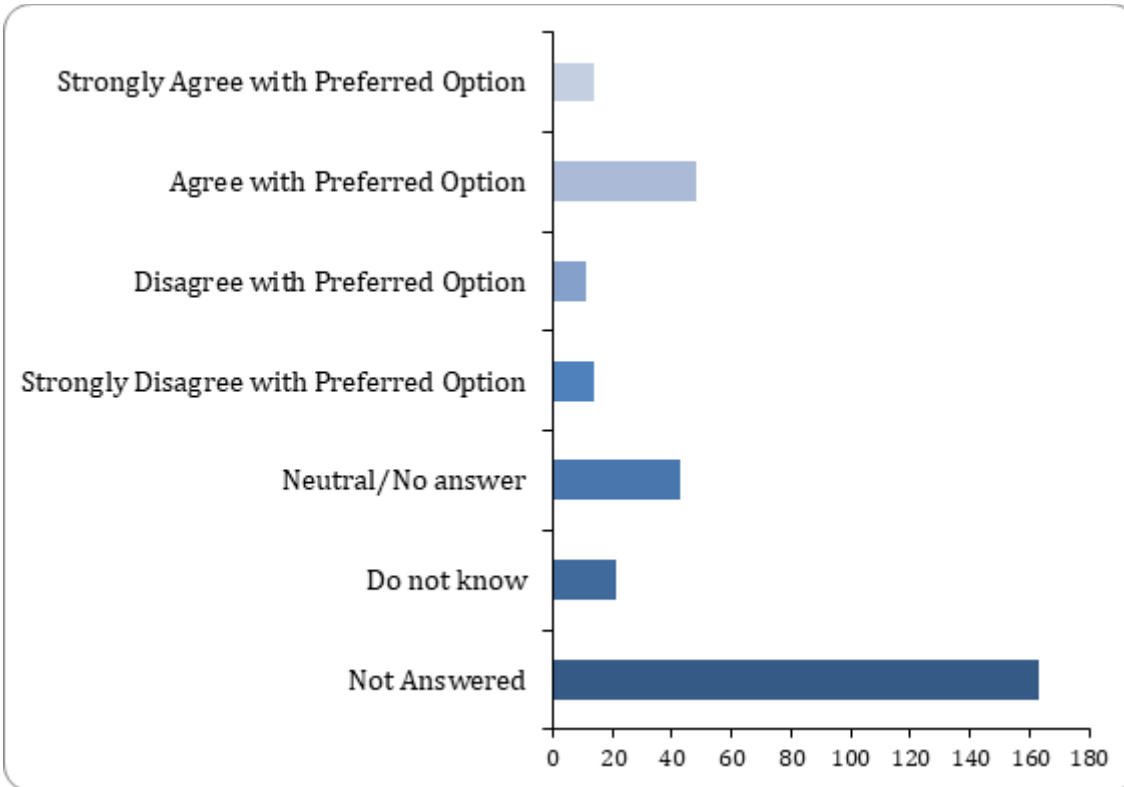
2056		ensure that any loss of employment floorspace	

Draft Policy	Summary of comment	Response	Outcome
2057	and large businesses. Therefore, it is considered that this part of the draft policy should be reconsidered to include a proportionate element in order to ensure that sustainable development can be achieved. The last paragraph of this draft policy states that development proposals for residential development on all employment sites will be assessed by a “balanced judgement” which will take into consideration a number of “objectives”. Oxfordshire County Council Property and Estates Team considers this part of the draft policy to be confusing, as it is unclear as to the purpose and weight this “balanced judgement” would attract in decision making. It is also unclear as to whether this would fall within the assessment carried out by a decision maker when conducting the planning balance or it would consist of a separate process. Last, it is unclear as to the weight each of the six proposed objectives should attract in decision making. It is therefore difficult to ascertain whether it would be expected of a decision maker to attach equal weight to all of them, when carrying out their assessment.	at these larger sites would not result in a loss of jobs. While it is clear that there are concerns about using the number of jobs as a metric to assess floorspace losses at Key Employment sites, no other specific metric is proposed or suggested. No change proposed. The phrase ‘a balanced judgement’ was an amendment made by a Planning Inspector. These are the issues that the case officer needs to consider when determining such an application. There is not a separate process. The weight needs to be applied through a “balanced judgement” which considers all aspects. We will discuss with our DM colleagues to ensure that they can follow the policy.	

All Public Responses – Draft Policy E2

Please tell us what you think about policy options set 004b (draft policy E2): Warehousing and Storage Uses. If you have any additional comments please put them in the comment box below.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	14	4.46%
Agree with Preferred Option	48	15.29%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	14	4.46%
Neutral/No answer	43	13.69%
Do not know	21	6.69%
Not Answered	163	51.91%

Topic	Summary of comments	Response
Support with suggested amendments	Policy E2: Should go beyond 'promote the use of freight consolidation centres where possible' and aim to proactively identify potential sites for consolidation centre(s) for more efficient distribution into the city.	Preferred Option selected for reasons set out in Background Paper
Support in principle	ONV supports the principles behind this policy, however, considers that the flexibility of the policy should depend upon the appropriateness of the location rather than whether there is a demonstrable need for the use on the site. Oxford North, for example, has very good access to the strategic highway network and could be considered an appropriate location for some warehouse and storage use.	We will consider this issue when drafting the Reg. 19 policy. Noted.

Support freight consolidation and local B8 uses.	CPRE support an exemption for freight consolidation if the aim of this is specifically to decrease the number of delivery journeys required by road.	Support Noted.
Object to B8 uses supporting national economy.	We support for loss of B8 uses, but the word “generally” must be deleted in order to make this policy possible to apply in practise.	The word “generally” in this context is not contained in the policy. It is in the supporting text and refers to some of the characteristics of new large-scale B8 uses. We consider it is

Topic	Summary of comments	Response
	Specifying support for new B8 uses if required to support locally recognised employment sites is a useful clarification we support, but declaring support for B8 sites that support the national economy once again removes clarity and undermines the aim to intensify employment sites and decrease the total number of B8 sites in Oxford.	appropriate, given the context in which it is used. Support for local B8 uses noted as is objection to policy support for B8 uses supporting the national economy. Preferred option selected for reasons set out in Background Paper.

Policy is overly restrictive and inappropriate.	Whilst it is acknowledged that larger Clas B8 facilities can consume a lot of land, they are essential in a local economy and they don't always need to consume large areas of land. They provide diversity and opportunities to local residents and support other uses. Such uses around Oxford should be viewed in a positive light. The Mini Plant Oxford (BMW) and Unipart sites are the only significant key employment sites conducive to the delivery of a diverse range of employment uses including B8 (by virtue of their size and location). Draft Policy E2 appears to aim to allow such a use, but the requirement to demonstrate that the use is essential to support the operational requirements of that key employment site is inappropriate and overly restrictive. It's worded so it has to be	Noted. Noted. We will consider these comments when drafting this policy for the next stage of consultation (i.e., Reg. 19).

Topic	Summary of comments	Response
	essential to support other development on the same key employment site, which is nonsensical.	
General principle supported	ARC supports the general principle of Draft Policy E2. Supports the flexibility of E2 in that the policy supports new B8 uses, while also allowing their loss within key employment sites.	Support noted.

Policy tests	ARC questions whether the policy tests relating to whether its provision/loss is 'essential' to the Key Employment Site is required. This should be determined by market conditions.	We will consider these comments when drafting this policy for the next stage of consultation (i.e., Reg. 19).
Support existing approach	Reasons provided include: • Restrict B8 uses to nationally important sites only.	Preferred Option selected for reasons set out in Background Paper
Support Preferred Option	Support preferred option	Preferred Option selected for reasons set out in Background Paper
Support Freight consolidation pilot	Reasons provided include: • Strong support for freight consolidation if the aim of this is specifically to decrease the number of delivery journeys required by road. • would be valuable to enable LGV/ HGV freight to be moved to electric delivery vehicles.	Preferred Option selected for reasons set out in Background Paper
Object to Freight consolidation pilot	Reasons provided include:	Preferred Option selected for reasons set out in Background Paper

Topic	Summary of comments	Response

	• reject idea of freight consolidation centre in any single location. • Council should prioritise increasing freight transfers from HGV and other goods vehicles to cargo/e-cargo bike enterprises at a wide variety of lay by sites or comparable to help reduce large vehicles entering Oxford on as many routes as possible. • Also, cooperation with other local authorities to make this a common policy to assist in traffic reduction should be pursued and implemented. • The specific exemption to enable a 'pilot' of a suitably located freight consolidation centre is highly problematic. Too many so-called 'pilots' do not have clearly defined objectives, are not adequately monitored and evaluated, allowing them to proceed. They should be fully transparent and re-designated as phase 1 projects if that is the intention.	
Support further restrictions	Reasons provided include: • If an employment site requires a massive warehouse to be viable then it shouldn't be built in an area with such restricted space. Build a different type of employment site	Preferred Option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	that makes better use of both the location and where the warehouse would have to be. • Land within the city is too scarce for this use.	
Rely solely on National Policy	Reasons provided include: • More bureaucracy • Don't create an interventionist policy • Let the free market decide	Preferred Option selected for reasons set out in Background Paper
No warehousing on new sites.	Warehousing etc should not be allowed on new sites at all. It is an ineffective use of scarce space and provides little employment. It is not Oxford City's role to support the national economy.	Preferred Option selected for reasons set out in Background Paper
No B8 on green belt	No new warehouses should be built on green belt sites	Preferred Option selected for reasons set out in Background Paper
Support loss of B8 uses	Support for loss of B8 uses, but the use of the word "generally" would make this policy impossible to apply in practise.	The word "generally" appears in the supporting text rather than the policy in relation to a description of "large scale B8 uses". It is appropriate given its descriptive context.

Support local B8 uses but not national	Specifying support for new B8 uses if required to support locally recognised employment sites is a useful clarification but declaring support for B8 sites that support the national economy once again removes clarity and undermines the aim to intensify	Preferred Option selected for reasons set out in Background Paper
Topic	Summary of comments	Response
	employment sites and decrease the total number of B8 sites in Oxford.	
Land values enough to deter inefficient uses	I would expect the high cost of land in the city to mostly suffice to deter inefficient uses.	Preferred Option selected for reasons set out in Background Paper
Unlikely to be needed	Major storage sites rarely need to be located within the city.	Preferred Option selected for reasons set out in Background Paper
MINI Plant Oxford	The MINI Plant is suitable for new B8 employment uses that support its primary manufacturing use	Preferred Option selected for reasons set out in Background Paper
General comment	Do not understand the question	Preferred Option selected for reasons set out in Background Paper
Too much jargon	I don't really understand this - e.g. sizing of these warehouses etc. Would need de-jargonising and more detail to be able to take a view.	Preferred Option selected for reasons set out in Background Paper

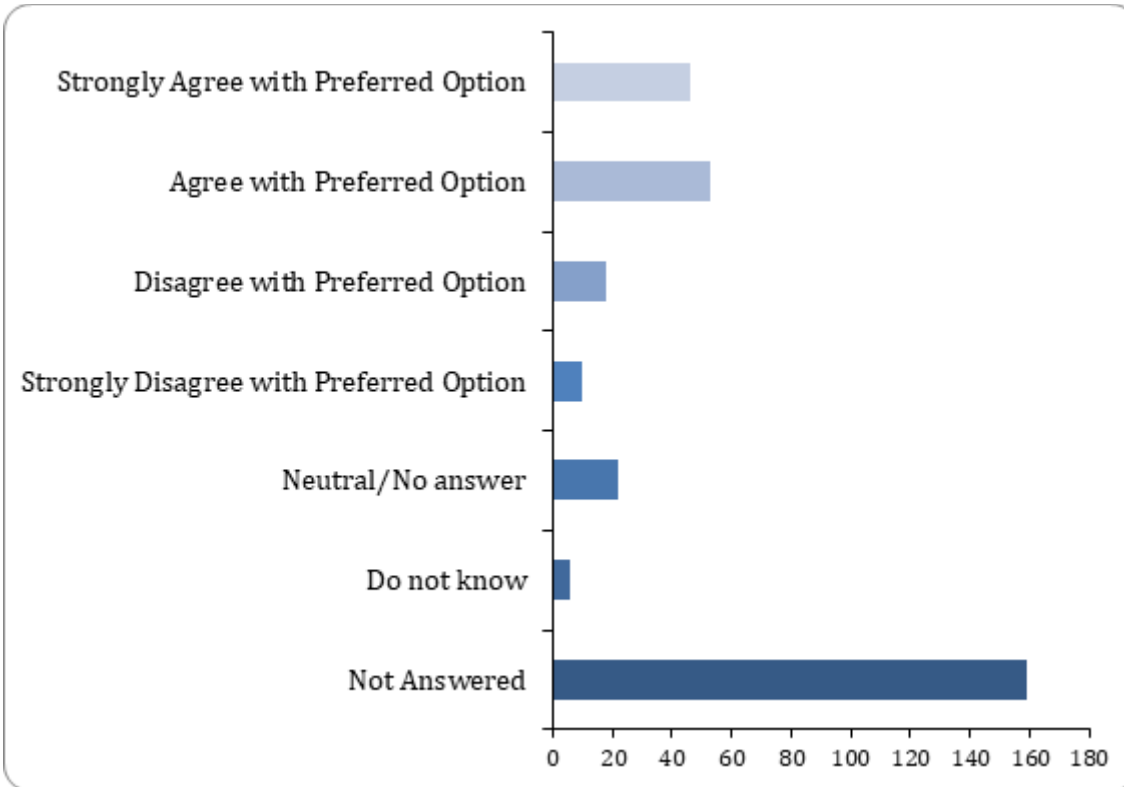
Statutory Consultees – Draft Policy E2

No statutory consultee comments on draft policy E2.

All Public Responses – Policy E3

Please tell us what you think about policy options set 004c (draft policy E3): Community Employment and Procurement Plans. If you have any additional comments please put them in the comment box below.

There were 155 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	22	7.01%
Do not know	6	1.91%
Not Answered	159	50.64%

Topic	Summary of comments	Response
General Comment	CEPP submissions should be supported by compelling evidence.	Noted.
support	Support as genuine mechanism for supporting community wealth building. Should be strengthened to reference “community & solidarity economy” businesses within the local economy and recognise the role that these “social trading” businesses play in inclusive development.	Support noted.
CEPPs may not be practical.	For many small occupiers a CEPP requirement may not be practical or reflect their realities. The draft policy should recognise that a CEPP must be proportionate with the type of development and employment. It is recommended that the policy is an encouragement, not mandatory requirement to provide flexibility. Alternative Option 1 is supported.	CEPP requirement only applies to qualifying developments as set out in policy. Preferred Option selected for reasons set out in Background Paper
Clarity in relation to student accommodation	Policy E3 relates to the provision of Community Employment and Procurement Plans where developments are proposed which include the provision of 50 or more dwellings or where they propose 1,000 Square metres of non-residential employment space. The policy is unclear on how this would relate to uses such as student accommodation and clarity is required on that. This matter was raised as part of the previous 2040 local	The equivalent number of dwellings that relate to student accommodation is usually calculated using the most recent ratios set by the

		Government. We will consider how to address this issue more widely as it

Topic	Summary of comments	Response
	plan submission and has not been addressed as part of this latest consultation.	likely impacts more than this policy in isolation.
Objection	Policy promotes too much government interference in the operation of business.	Noted.
Support	The approach to Community Employment and Procurement Plans is supported.	Noted.

Object to mandatory CEPPs	CEPPs should not be mandatory for all commercial schemes. This adds to viability concerns. The mandatory expectation that all developments of a certain threshold “must” address “all” of the listed interventions risks imposing rigid and overly burdensome obligations on proposals. The cumulative cost and complexity of implementing all the listed criteria may not be possible. Many of the listed criteria (e.g., use of local labour or enforcing Oxford Living Wage policies on contractors and occupiers) may not be deliverable or enforceable across all schemes.	CEPP requirement only applies to qualifying developments as set out in policy. A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage. The Reg. 18 policy did not impose a mandatory requirement but rather that “CEPPS will be expected to consider all the following criteria”. We will review wording, taking this point into consideration when drafting the Reg. 19 version of this policy.

Topic	Summary of comments	Response

Amendment	ARC therefore recommend that Policy E3 be amended to remove the rigid “only be granted” condition, instead framing CEPPs as a potential tool of securing social value in proposals. The listed interventions (a-i) should form a flexible menu that can be tailored by development scale and context. ARC notes the Council states a TAN will be needed to expand on various aspects of the policy – it considers this TAN should be published before or alongside Regulation 19 to provide much-needed clarity to the policy. ARC recommends removing the requirement for schemes below the threshold to submit written statements. The administrative and resource burden of preparing bespoke employment-related statements for minor planning applications will likely be disproportionate to the scale and impact (and potential value) of such developments. Furthermore, the practical ability of monitoring or securing any proposed outcomes does not exist – resulting in this being a box-ticking exercise adding unnecessary cost to developers whilst delivering little measurable value.	The intention of the policy is that the list (a-j) forms a flexible menu. The Reg. 18 document set out that CEPPs will be expected to consider all criteria a)-j). We will review wording, taking this point into consideration when drafting the Reg. 19 version of this policy. Noted. We consider that the production of a written statement for development below the threshold is proportionate. If developers view this process as a “box-ticking exercise” that is a shame as when done well, CEPPs can provide valuable opportunities both for local people and businesses.

Topic	Summary of comments	Response
Require CEPPs	Reasons include: Procurement plans for major developments should be required to demonstrate a particularly high standard of ethical and sustainability criteria.	Preferred Option selected for reasons set out in Background Paper

Encourage CEPPs	Reasons include: • Not all applications need to prepare a Community Employment and Procurement Plan. Currently Oxford secures this through a S106 agreement which is the most appropriate way forward as it can be assessed on a site-by-site basis. • BMW support alternative option 1, to recognise those occasions where a Community Employment and Procurement Plan would not be appropriate or feasible (e.g. specialist materials or construction methods). • It is important not to discourage businesses from setting up in Oxford. • Every additional compulsory document increases the cost and risk of bringing forward major schemes, particularly for smaller developers who are crucial to Oxford's infill housing and lab refurb pipeline. • Training and local hiring targets are laudable, yet they can be secured through voluntary agreements, sector charters or postconsent s106 negotiations without turning the planning gateway	Preferred Option selected for reasons set out in Background Paper
Topic	Summary of comments	Response

	into another compliance hurdle that slows delivery of homes and workspaces the city urgently needs. Plans are likely to be totally ineffective in delivering training and education and will merely be an extra cost for applicants.	
Rely solely on National Policy	Reasons include: - Don't impose requirements on builders, let them build. - It isn't the responsibility of the city planners to mandate that employers plan to continue employing labour.	Preferred Option selected for reasons set out in Background Paper
General comment	Avoid complications at this stage that might deter house builders.	Preferred Option selected for reasons set out in Background Paper
Objection	This is virtue signalling and will result in no benefit except to consultants who will create meaningless unenforceable plans and strategies	Preferred Option selected for reasons set out in Background Paper
General comment	A good policy but doesn't it create more red tape for developers and cost for Council?	Preferred Option selected for reasons set out in Background Paper
General comment	But it would be better still to consider whether endless growth and development is what is needed.	Preferred Option selected for reasons set out in Background Paper
Support local opportunities	- Strongly agree that local jobseekers and local suppliers should have first right of refusal to opportunities created in Oxford. - To promote employment opportunities for local people.	Preferred Option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	• Local businesses, designers, contractors and employees should be prioritised strongly • It sounds like a good idea to source labour and materials locally to provide local employment and reduce the environmental impact of the supply chain. • Local businesses, designers, contractors and employees should be prioritised strongly. • Clause to ensure that these plans are locally led and have clear evidence of local inputs and stakeholder engagement.	
Support Oxford Living Wage	We would strongly support an additional policy that requires employers to pay employees and indirectly employed workers (such as contractors) the Oxford Living Wage.	The Oxford Living Wage is already included as a potential “criterion” for consideration under the CEPPs Policy.

In principle support (with suggested amendments)	Support inclusion of policy requiring CEPPs however a stronger focus on local procurement is needed to properly align with national policy. The failure to use local businesses in the procurement of major projects in Oxford needs to be corrected. If the policy focuses on the engagement of local businesses rather than individuals, this will have a much greater and longer-lasting beneficial	Support noted.

Topic	Summary of comments	Response

	effect on the local economy and the environment. The distances travelled will be far less, the numbers of people engaged will be far more, and the businesses will keep them employed after the project has concluded. If the policy covers not just construction jobs but also the design jobs and supply jobs which are all part of the procurement process, then that will have a wider positive impact too. Suggest this wording for the policy E3: <i>Planning permission will only be granted for proposals.....where they are supported by a site-specific Community Engagement and Procurement Plan (CEPP). The CEPP must identify how the procurement process has already and will ahead:</i> A. <i>optimise the potential for local businesses to undertake as much as possible of the work in the design, supply and construction processes, for instance by the tendering of discrete work packages rather than combining them into larger contracts and by setting eligibility criteria which are viable for smaller businesses,</i> B. <i>use a method of assessment of tenders and bids which gives appropriate weight to:</i> • <i>lower carbon footprint through travel and other measures,</i> • <i>levels of local employment,</i> • <i>commitment to the Oxford Living Wage,</i>	The policy already includes “criteria” e) and h) which expect applicants to consider: e) Procuring a proportion of on-going supply chain needs locally; h) Procuring a proportion of construction materials locally. The introduction of local planning policy requirements (in the manner suggested here) to govern the specific tendering processes of individual businesses and organisations would fall outside of the remit of local planning policy. Preferred option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	• <i>training programmes,</i> • <i>and community engagement.</i> <i>The CEPP will set a target for the percentage of the total expenditure on the project that is to be delivered through local businesses and will record the actual percentage upon completion. This data will be available upon demand by OCC and then to the public.</i> <i>The City Council will use a condition to ensure the CEPP is adopted and followed by the applicant.</i>	

Statutory Consultees – Draft Policy E3

Oxfordshire County Council

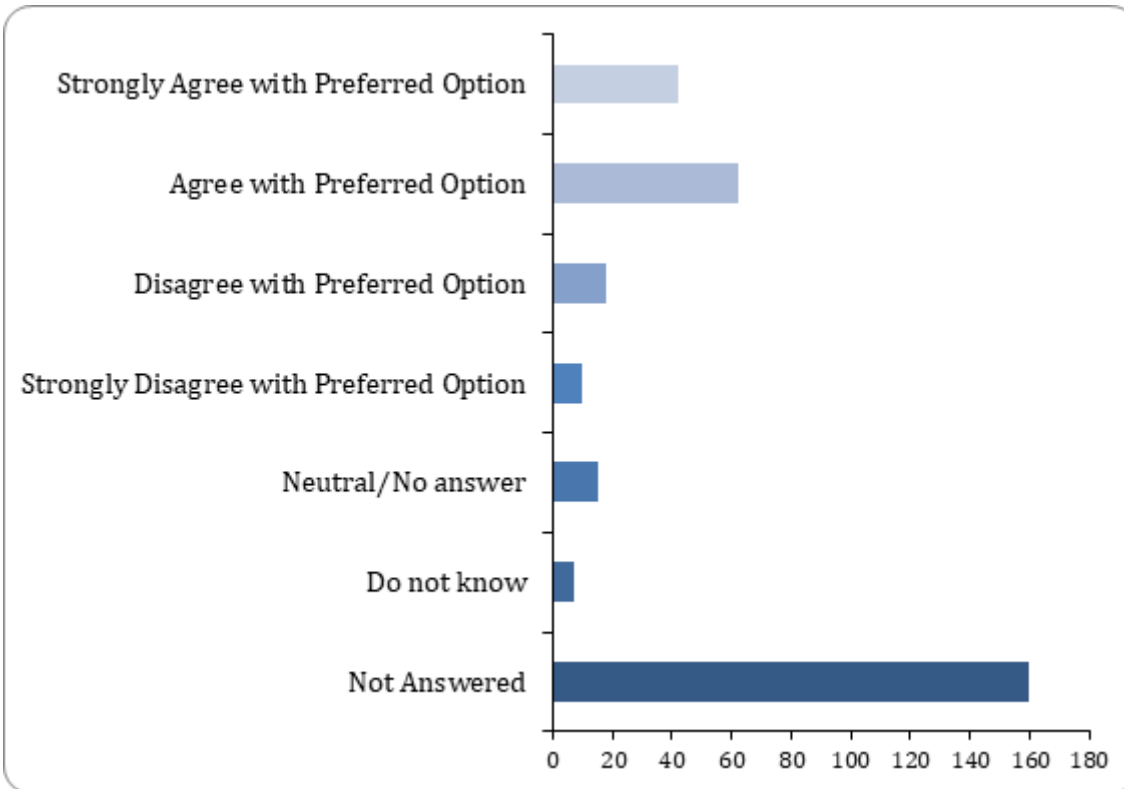
Summary of comment	Response	Outcome

Strategic Planning Enterprise Oxfordshire (formerly OxLEP) promotes policies requiring Community Employment Plans. The hospitality and care sectors suffer acute labour shortages within Oxfordshire and employment plans can support these sectors to develop a local skilled workforce where new	Noted.	No action required.
Summary of comment	Response	Outcome
development proposals are coming through the planning system. In conjunction with Enterprise Oxfordshire (formerly OxLEP) we therefore support this proposed policy. In addition, we would like to highlight that clarity regarding what is understood as ‘the inclusive economy’ on the first paragraph of the policy would be welcomed, as it would better direct developers on this matter.	The city’s economic strategy sets out what is meant by the ‘inclusive economy’. It is also included in the glossary of the plan.	No action required.

All Public Responses – Policy E4

Please tell us what you think about policy options set 004d (draft policy E4): Affordable Workspaces.

There were 154 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	42	13.38%
Agree with Preferred Option	62	19.75%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	15	4.78%
Do not know	7	2.23%
Not Answered	160	50.96%

Topic	Summary of comments	Response
Viability	It is noted that Nuffield Sites are expected to deliver affordable workspace as part of their Masterplan and that details of the size, marketing, servicing and the management of these spaces should be set out in an affordable workspace strategy. We note that the definition of affordable workspace states that such spaces is to be available for rent set at an agreed rate below the commercial rent. It is understood, based on the current drafting of the Local Plan that the percentage reduction below the commercial rent is not defined and is to be agreed with OCC as part of the planning process. Our understanding is that any commercial rent reduction will need to be based on the ability of any scheme, i.e., in this case Nuffield Sites, to present a proposal that is capable of being financially deliverable and therefore able to absorb such costs as part of any viable scheme. Affordable workspace has a significant impact on viability and is a core and fundamental consideration in terms of development feasibility and deliverability.	Noted. The Local Plan Viability Study is to be published at the next consultation stage (i.e., Reg. 19).
Concerns about practicalities of implementation.	Operational requirements of major manufacturing/research units and logistical units may make it challenging to integrate smaller workspaces unlike with typical offices). The expectation to deliver as part of a phased development is also problematic because a critical mass will be needed to make it viable.	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
Would Support Encouragement of Affordable Workspaces subject to clarifications.	The provision of an affordable workspace strategy as part of masterplans should not prejudice owners of plots who are not party to masterplans which may or may not be prepared by third parties. In addition, it is unclear which companies would qualify for affordable workspace, particularly at SME level, and what percentage of floorspace would be expected to be delivered as affordable. Clarification on these matters is critical to understand how the policy will operate in practice and the cost of the policy on future developments. Any provision of affordable workspace should be subject to viability assessment to ensure that it does not prevent appropriate development coming forward. Therefore, in order to protect sites which may be caught by this policy it is suggested that amendments to the wording is included to ensure that viability of plots is not adversely affected. Alternative Option 1 which seeks to introduce text in the local plan encouraging employers to deliver affordable workspace in the city may be more appropriate, subject to clarification on the matters set out above.	Noted. The definition of “affordable workspaces” provides a selection of key sectors. No specific percentage is set – it is for the developer-led affordable workspaces strategy to determine. A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage. Preferred Option selected for reasons set out in Background Paper.

Object – Counterproductive to employment delivery	Requiring affordable workspace to be delivered in developments could be counter-productive to the delivery of employment developments. Provision of affordable workspaces will impact the overall scheme viability (particularly combined with increased CIL and potential affordable housing	Noted.

Topic	Summary of comments	Response

	contributions etc). Rental levels in the City are increasing due to demand for space and Oxford's appeal as a hub for research and development. This demand is out stripping supply, especially for laboratory space and any requirements that potentially decrease delivery would exacerbate the supply vs demand imbalance and hence push up rents. Furthermore, seeking to convert Category 3 employment sites to housing runs counter to the approach set out in policy E4 to provide more affordable workspace. In other areas, principally London Boroughs, new affordable workspace has been delivered most effectively via low-cost reuse and/or refurbishment of existing buildings to produce workspace at lower rents. This is especially relevant to Category 2 and 3 sites. However, ONV does support the need for a range of sizes of workspace in Oxford to meet the demands of smaller businesses. It is delivering this at Oxford North to meet a range of needs, including incubator space and smaller co-working areas. However, the general approach should be reconsidered in terms of affordable workspaces.	A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage. While the plan does support the loss of existing employment sites not designated as key employment sites to housing (subject to certain criteria) it also enables their regeneration for employment purposes. Support for a range and sizes of workspaces (but not specifically affordable workspaces) is noted.
Provision inappropriate in some circumstances	Whilst the difficulties experienced by SME's and Social Enterprises in finding affordable workspace is understood, this must be considered on a case-by-case basis. In some circumstances it would be inappropriate for this to be provided, particularly where development is for a specific end user rather than speculative development. In terms of Oxford Science Park, it is understood	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	that the intention for Oxford Science Park was to incentivise the best R&D businesses from around the world to lead and progress AI and science-based projects, to rival and compete against Cambridge and other locations globally. Placing restrictions on its use will compromise the ability for this to be achieved. Furthermore, it is noted that the Council now requests considerably higher rates of CIL for Class E Offices and R&D floorspace. There is concern that this would place a significant burden on affordable units. It is therefore requested that this policy is removed or, alternatively, the Oxford Science Park is removed from the list of sites where affordable workspace must be delivered.	A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage.
Objection to preferred option	Policy not supported by robust or quantified evidence and the rationale that large floorplates exclude SMEs is inaccurate. ARC delivers large floorplates specifically designed to be subdivided or flexibly let. Many SMEs at ARC occupy these formats. There is no clear assessment of unmet demand, market failure, or how mandatory provision would resolve this. Overall, as drafted, the burden of demonstrating market failure falls on the applicant, which is contrary to the Local Plan's role to assess and address such issues.	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	Singling out certain sites while exempting others raises fairness and effectiveness concerns.	
AW requirements	Any requirement for AW must be narrowly defined, supported by clear evidence by use class and typology, and viability tested. A requirement should differentiate between different site types and ownership/funding structures (e.g. lab campuses, logistics parks, mixed-use areas) – lab-enabled buildings, in particular, involve much higher build and operational costs.	Glossary provides a definition of affordable workspaces. Preferred Option selected for reasons set out in Background Paper
Details left to a TAN	The Council notes further details would be deferred to a future TAN, this is unacceptable and introduces uncertainty and risks reliance on guidance rather than policy.	TANs are often used to provide Technical Advice for applicants/ decision-makers. Preferred Option selected for reasons set out in Background Paper.
Support flexibility of policy	Osney Mead is included within the policy as a site expected to deliver a strategy for affordable workspace. The rationale for the policy (i.e., to facilitate a broader range of businesses within the City), is appreciated by OUD.	Support noted.

Topic	Summary of comments	Response
	Policy does not include a specific percentage requirement. This approach is supported by OUD as it allows flexibility for the provision of affordable workspace to be subject to development viability.	
Require affordable workspaces in line with Draft Policy E4	Reasons include: - Strongly Support E4 Preferred Option which sets out the principle that larger workspace developments need to include an affordability strategy as a part of their masterplan. This is intended to ensure that where there is employment space this is accessible for smaller business and social enterprises. - The preferred option would add a full policy and is therefore the strongest stance. We would also be interested in seeing if this could be applied to retail units in order to provide affordable premises for local independent retailers.	Support noted.

Encourage affordable workspaces	Reasons include: - While the principle of providing AW is accepted is often something developers would like to provide, this is highly dependent on scheme viability, and in a market where many commercial developments are already facing financial strain, requiring developers to provide this would likely stifle otherwise viable projects. - Do not consider it is appropriate to require developers to provide both AW as well as a contribution towards affordable housing (as currently required by H5) - this creates an unfair burden on the developer and	A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage. Viability assessment considers cumulative financial implications of policies in the plan.

Topic	Summary of comments	Response
	creates significant additional costs over and above a reasonable and appropriate level. - We consider this policy would adversely impact Class E focussed development in Oxford. - Policy approach is unsound without more evidence on proportional justification and viability. The Council could instead encourage affordable workspace delivery.	Preferred Option selected for reasons set out in Background Paper.

Rely Solely on National Policy	Reasons include: • Avoid complicated restrictions. Not necessary. • Do not incorporate the concept of affordable workspace in the Local Plan • A free-market solution seems sufficient here. If high-value workplaces outcompete others, good, they're higher value. • Unclear how a larger company should be expected to support a smaller rival, as policy that only included social enterprises justified, seems to be too much interference in normal market operation. • Such policies are unlikely to be enforceable.	Preferred Option selected for reasons set out in Background Paper.
Support principle subject to viability and flexible	Do not object in principle to inclusion of a policy requiring the provision of affordable workspaces. Supporting access to workspace for a diverse range of businesses and organisations is important for maintaining Oxford's economic diversity and resilience.	Policy E4 does not set out a requirement to deliver a specific amount of affordable workspace but instead requires an affordable

Topic	Summary of comments	Response

application of policy.	However, any requirement for affordable workspace must be reasonable and proportionate to the scale and nature of the proposed development. It is essential that such obligations are clearly defined, commercially viable in their own right, and do not unduly impact the deliverability of scheme, particularly where developments are already contributing to other planning priorities such as affordable housing or sustainability measures. We encourage the Council to ensure that the policy includes flexibility in its application, with consideration given to site-specific circumstances, market conditions, and the overall viability of development proposals.	workspace strategy (AWS) to be produced to support development proposals on the specific list of sites. Preferred Option selected for reasons set out in Background Paper.
Policy compliance monitoring needed	Also needs careful monitoring of compliance and sanctions for noncompliance, if you are to send a supportive signal to those who would benefit for more affordable workspaces.	We will consider issue of monitoring/ compliance/ delivery/ implementation as we draft the Reg. 19 policy E4.
Encourage discounted workspaces through TAN guidance, grants or on council-owned sites.	Requiring every big R&D or office project to carve out subsidised space risks repeating Oxford's housing mistake: load viability costs onto new supply and you simply get less of it. The Plan itself recognises that premium rents stem from a shortage of modern floorspace, not from developer indifference, and that any affordable-workspace offer must clear a "minimum size" and be underpinned by a detailed management plan and legal agreement. Those layers add delay and cost, deterring precisely the investment that would expand capacity and cool prices for all tenants, SMEs included. A stronger economy-of-scale solution is to encourage discounted studios and labs (via TAN guidance, targeted grants or city-owned sites) while letting high-value	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	schemes proceed quickly, thereby increasing total stock, fostering competition and giving small enterprises a wider choice of locations without mandating cross-subsidies that may never stack up.	
General comments	Workplaces that can't sustain themselves aren't long term viable. Commercial development should be minimal Care needed to avoid making development requirements too onerous Subject to demand. There are empty workspaces around the place...question of scale?	Preferred Option selected for reasons set out in Background Paper.

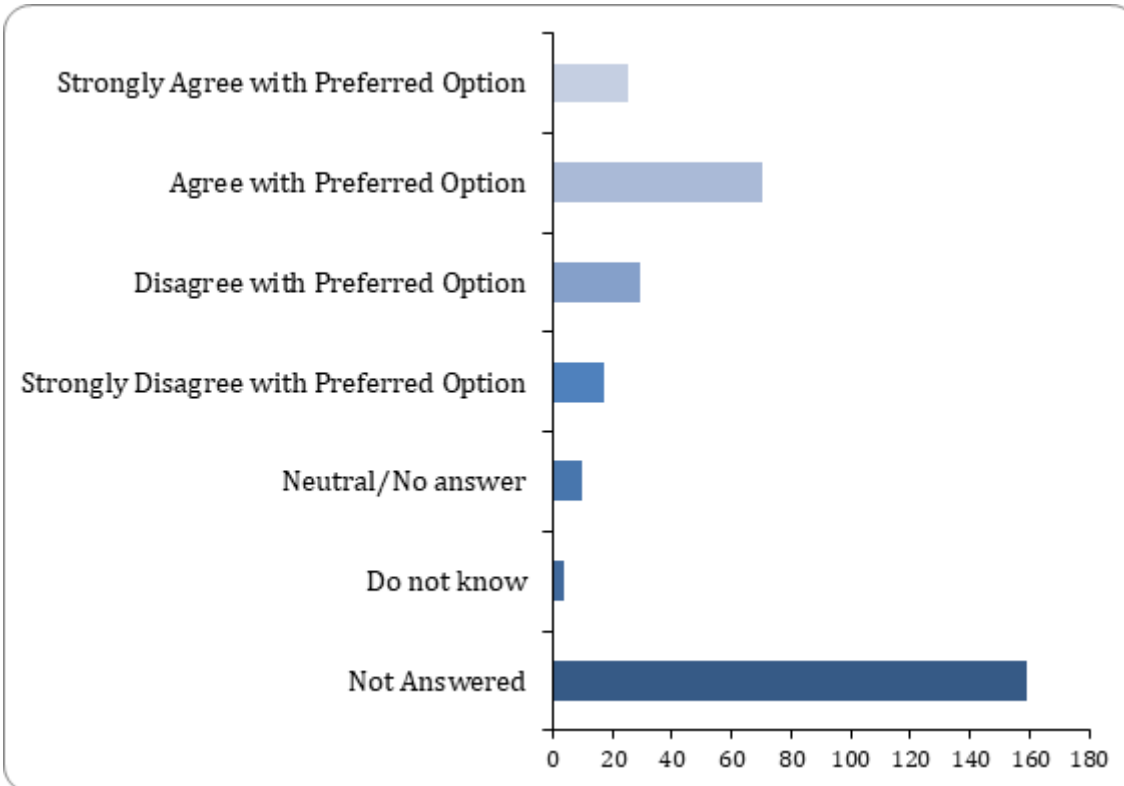
Statutory Consultees - Draft Policy E4

No statutory consultee comments.

All Public Responses – Draft Policy E5

Please tell us what you think about policy options set 004e-1 (draft policy E5): New Tourism and Short Stay Accommodation.

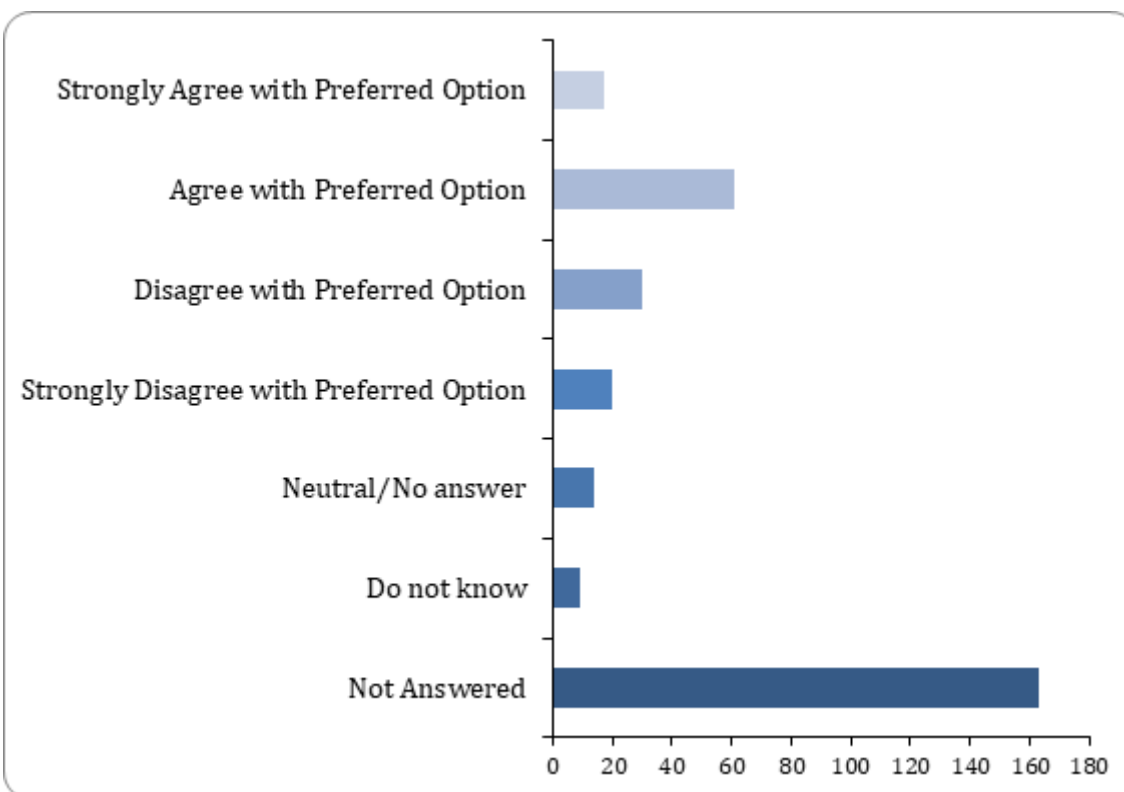
There were 155 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	25	7.96%
Agree with Preferred Option	70	22.29%
Disagree with Preferred Option	29	9.24%
Strongly Disagree with Preferred Option	17	5.41%
Neutral/No answer	10	3.18%
Do not know	4	1.27%
Not Answered	159	50.64%

Please tell us what you think about policy options set 004e-2 (draft policy E5): Existing Tourism and Short Stay Accommodation.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	17	5.41%
Agree with Preferred Option	61	19.43%
Disagree with Preferred Option	30	9.55%
Strongly Disagree with Preferred Option	20	6.37%
Neutral/No answer	14	4.46%
Do not know	9	2.87%
Not Answered	163	51.91%

Topic	Summary of comments	Response
Consider additional reference to level of need within policy/ supporting text.	We agree with Policy E5 in that it supports hotels in the city and district centres, allocated sites, and on Oxford's main arterial roads where there is frequent and direct public transport to the city centre. The policy could be further improved if it made reference to the number of hotel beds needed. The Council's evidence-based document regarding hotels is the Hotel & Short Stay Accommodation Study for Oxford (March 2023), by Bridget Baker Consulting Ltd. It sets out that by 2040, there will be a need for 2,475 new hotel beds. We think that this number is significant and should be referenced in the policy.	Support noted. We will consider making a reference to the overall need for bedspaces in the Reg. 19 Plan.

Consider whether suggested additional issues should be covered by this policy/policies in the Local Plan	Tourism is a significant sector of Oxford's economy and with it brings its own pressures and problems. It is disappointing to see that there is only one policy within the Local Plan which addresses this issue. Whilst we welcome a policy which seeks to restrict and manage short stay accommodation across the city, there are many other impacts of tourism that need to be managed. Other issues that the policy (or other standalone policies) should cover include impact of tourism on the city's historic core, how the public realm could be improved to accommodate large groups, how tourists arrive and depart from the city and how and where coach parking could be provided.	Support for policy noted. Preferred Option selected for reasons set out in Background Paper. These issues seem to extend beyond the remit of local planning policies. The County Council are in the process of producing a movement and place framework (COMPF). How best to address wider issues including tourist coach parking is also being looked

Topic	Summary of comments	Response
		at outside of the Local Plan process.

Increased flexibility for loss of hotel/ short stay accommodation where sites allocated for comprehensive mixed-use development.	It should be made evidence in the policy that flexibility should apply with regard to the application of this policy against wider plan policies to enable development to be delivered to meet the ambitions of the Local Plan and in particular with reference to the Nuffield Sites. It is suggested that supporting text is incorporated which supports a flexible approach toward loss of short stay accommodation where site allocations are supported for comprehensive mixed used redevelopment, as well as an additional bullet point included in the policy itself regarding the list of circumstances where the loss of short stay accommodation is supported. This additional bullet point could be incorporated/read as follows: • Or forms part of comprehensive, mixed used development scheme.	Preferred Option selected for reasons set out in Background Paper. Policy already includes appropriate criteria to support loss of hotel/ short stay accommodation.
Policy should state that new homes are always the priority.	Whilst CPRE support the intent of this policy the provision of homes should always be prioritised over short stay accommodation, such as hotels, and this should be stated in policy. Need tighter wording in the policy from 'must' to 'would'.	The policy supports new hotel and short stay accommodation in line with national policy (i.e., within the city and district centres. It also provides support for new hotel and short stay accommodation on arterial roads for the reasons set out in the Policy/ Background Paper. Outside of these locations, housing is prioritised.

Topic	Summary of comments	Response

Prioritise housing	Reasons include: • The city should prioritise meeting the needs of its residents and those who contribute to the local community first, before expanding space for tourism. • Tourism often drives up the cost of living, making it increasingly difficult for local people—especially workers and families—to afford a decent quality of life. • Ensuring affordable housing, services, and amenities for residents must come before catering to tourists, so that the community can thrive sustainably and inclusively. • Short stay accom unless in hotels should not be priority. Local housing should. More Short term rentals, Airbnb etc should be discouraged.	Preferred Option selected for reasons set out in Background Paper.
Role of student accommodation (outside term-time) to support visitor economy.	The policy identifies that tourism is an important contributor to the local economy and identifies that the locations in which tourist accommodation will be supported. Elsewhere in the Local Plan it is recognised that the use of student accommodation outside of term time is supported therefore, there is the potential to provide support in this policy for the use of student accommodation outside of term time for short stay accommodation which would support the local economy through the provision of tourist accommodation.	Noted. The Plan already recognises the secondary role that student accommodation can play (outside of term-time) in supporting the visitor economy. As such, there is

Topic	Summary of comments	Response
		no need to duplicate that reference in this policy.
Support and suggested amendment to include specific reference to changes of use.	Ch Ch supports this policy - Tourism is important to the economy of Oxford, in particular the City Centre. Christ Church is a major tourist destination and as such it is important that tourist and short stay accommodation is provided to support this and maximise the length of time visitors stay in Oxford. The policy should include reference to change of use in the first sentence. Currently it only covers new development but change of use of existing buildings is also key, for example the former Boswells store.	Support noted. Reg. 18 Plan draft policy E5 includes the phrase “new sites”. We will consider whether this phrase suitably covers changes of use when drafting the Reg. 19 version of the policy and supporting text.
(New acc.) Support preferred policy approach	Support preferred option	Support noted.

Support new hotel/ short stay acc. in city and district centres / allocated sites only	Reasons include: • accommodation for tourists is vital for the local economy, but it also exerts pressure on housing for residents. Hence, I feel sites on the main arterial roads would be better used for long-term accommodation	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	• I am strongly in favour of restricting new short stay accommodation and am supportive of the idea to restrict this in residential areas. I am not sure about the inclusion of entire arterial routes.	
Support new hotel/ short stay acc. anywhere in Oxford.	Reasons include: • Draft Policy E5 artificially throttles supply just when the Plan itself recognises “strong demand” and the economic value of longer visitor stays. • A broader criteria-based policy would allow under-used brownfield land or mixed-use schemes anywhere in Oxford to add rooms, easing pressure on both residential rents and weekend traffic without sacrificing quality, because applications would still need to satisfy access, noise and H8 “no loss of dwellings” safeguards. • In a land-constrained city, expanding capacity, rather than rationing locations, is the surer route to a vibrant visitor economy and a healthier housing market.	Preferred Option selected for reasons set out in Background Paper.

Outside city and district centres, resist new short stay acc. anywhere in the city	Reasons include: Hotels and proper B and Bs should be encouraged in non-residential areas, but other short stay accommodation restricted as much as governments rules allow. Air Band B and similar businesses cause the loss of homes and often result in nuisance for neighbours. In addition, they lack proper controls on fire and other risks.	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
Rely solely on National Policy	Reasons include: - Try to be as un-prescriptive as possible, let the market, supply and demand, define what is provided/invested in. - The Council should not be meddling in area. They will just make everything more expensive. - Should encourage more 3 and 4 star hotel capacity - Council policies ought to focus on reducing this growth and prioritise residential housing.	Preferred Option selected for reasons set out in Background Paper.

Further restrict new hotels/ short-term lets.	Responses include: • We need to keep Oxford a place where people can live. no more short stay accommodation, hotels etc. I am not sure which one of the options to choose but you need to really stop Airbnb and chains. its destroying oxford • No need for additional short stay accommodation in the City centre. • Where a short-stay accommodation is proposed in the centre, it should be either long-term accommodation or a service, like a convenience store, an event's venue, anything for the community. • Many other cities have, for example, restricted Airbnb's. • Tourism has a disproportionate impact and can price out residents from their own cities. Tourists, unlike students, do not live in Oxford,	The Government is in the process of introducing specific legislation to address short lets (including Airbnb). However, permitted development rights exist for temporary changes of use. Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response

	they are not residents, they do not vote for you. You represent the residents. • Do not allow more Airbnb type accommodation • Why is there no Option 2: resist expansion of short-stay accommodation! And do not protect existing short-stay accommodation! • We do not need more short-stay accommodation. We need residential communities. • You can create a different economy instead. Use buildings for long term housing and for shops and service for residents, or as highlighted in another section, for other businesses offering employment.	
Do more with student acc. to support tourism	More use should be made of university accommodation to house tourists within the city rather than using our existing space to accommodate people who don't live & work here.	Preferred option selected for reasons set out in Background Paper.
Evidence/ audit of existing hotels needed	Oxford City Council's Planning Department has been suffering from 'hotel fever' for some time. The provision of short-term accommodation when many tourists are coach visitors and will not stay in Oxford means that an independent assessment is needed to judge whether current short stay accommodation is sufficient to meet actual demand at present, and projected demand based on post-Covid trends.	A Hotel and short stay accommodation study forms part of the evidence base. Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
Are more hotels needed?	Does Oxford need more accommodation for tourism? The City is overrun with coaches and large groups in the centre overwhelming local people on the pavements. Of course, Oxford is a heritage site, but surely there must be limits or people will be put of visiting as it becomes so unpleasant.	Preferred Option selected for reasons set out in Background Paper.
Don't lose housing to Airbnb/ short lets	Really important that we don't lose too much housing to Airbnb or short lets.	The Government is in the process of introducing specific legislation to address short lets (including Airbnb). However, permitted development rights exist for temporary changes of use. Other policies in the plan protect against the loss of dwellings.
Already a lot of hotels in Oxford.	There also seem to be a great many hotels in Oxford. Oxford is diminishing with too much tourism - how much do tourists actually spend, for example? The streets and experience of the city is much less than it was 20 years ago...we don't want to be the next Venice or Barcelona!	Preferred Option selected for reasons set out in Background Paper.

New hotels/ short stay acc. Should not impact residential dwellings	Given the number of hotels/amounts of short-stay accommodation currently in the pipe-line, I think that OCC need to draw a line. I think that new accommodation should only be agreed with the proviso as stated in the draft	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	plan that it does not result in the loss of a residential dwelling OR the site is not suitable for provision of residential dwellings.	

General comments	Tourist accommodation should not be a priority when there is a housing crisis for local people. Should consider a tourist tax to stay Tourist taxes and other measures to restrict tourism will lead to worse finances for Oxford. Most tourists are day trippers. Do we really need more accommodation? Please consider existing communities before allowing permission for new developments. Tourist should rely on hotels or similar Too many hotels and student blocks already- to the detriment of affordable housing Restricting to arterial roads only is unhelpfully strict. More and more people are using Airbnb. This policy doesn't seem to have a huge impact. If tourist accommodation is lost to housing, then that is a good thing! This policy is weak around supporting a fair use of short stay accommodation in the centre that would not protect against loss of accommodation for workers and student	Local Plan seeks to balance competing needs including for new tourist accommodation and new homes. Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response

(Existing Tourism etc) support expansion in city and district centres and at arterial routes.	Support preferred option.	Support noted.
(Existing Tourism etc) do not include a policy	Reasons include: • Try to be as unprescriptive as possible, let the market, supply and demand, define what is provided/invested in. • Stop meddling! • Why would you protect it? If there is demand let it expand if not let it be removed. • The Council is busy creating more and more policies and restrictions which just add cost to developers and to Council officers.	Preferred Option selected for reasons set out in Background Paper.
Do not support expansion of existing short stay acc.	Reasons include: • Allowing the expansion of existing short-stay accommodation risks further increasing housing costs and reducing availability for local residents. Protecting these accommodations without strong restrictions may encourage more properties to be converted from long-term homes to tourist rentals, worsening the housing crisis. I believe stricter controls or limitations are needed to prioritise	Preferred option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	affordable housing for the community over tourism-related short stays. • No, as above, be very cautious about expansion of short stay accommodation - the criteria would need to be very tight! • The expansion of short-stay accommodation should be resisted. We need long-term homes for ordinary people, not yet more tourist accommodation.	
Temporary changes of use	Consideration given for alternative use even for a period of time. Could mean classification/license not loss but paused? could be very helpful with temp accommodation pressures.	Permitted development rights allow temporary changes of use already without the need for planning permission.
(Existing) - what are criteria?	Thought would have to be given to the criteria, and I am very concerned about the number of properties being illegally used for short lets (i.e., they are not properly registered).	The criteria were listed in the main policy document. Preferred Option selected for reasons set out in Background Paper.

General comment	Locking every hotel or guesthouse into perpetual tourist use would hamper the city's ability to repurpose sites for higher-value needs—especially housing—when market signals change; Oxford's land base is tight, and flexibility is paramount.	Preferred Option selected for reasons set out in Background Paper.
Topic	Summary of comments	Response
	By simply allowing expansion where viable and applying the usual design, transport and amenity criteria to any proposed loss, the Council can safeguard visitor beds when demand is strong while still freeing under-performing premises to become homes, labs or mixed-use schemes when that better serves residents and the wider economy. A light, criteria-based approach keeps supply responsive instead of ossified, advancing both tourism and housing objectives without unnecessary regulation.	
General comment/ clarity issues	Not clear what short stay means, is this hotels? Probably don't need more hotels in Oxford. Don't allow Air B&B and second homes for tourism rents.	Preferred Option selected for reasons set out in Background Paper.
General comment	Seems that this needs more work, guiding/regulation any short stay accommodation is important.	Preferred Option selected for reasons set out in Background Paper.

Statutory Consultee - Draft Policy E5

No statutory consultee comments.

All Public Responses to the Whole of Chapter 3

Draft policy	Topic	Summary of comments	Response

Chapter 3	Economic Strategy	As expressed in previous consultation responses, we have a fundamental concern about the very significant imbalance between the high number of jobs in the city and the much lower number of economically active residents, which has led to many problems including high levels of commuting into the city, traffic congestion, a shortage of housing and very high housing costs. We would like to see more being done to ensure that people can live in Oxford closer to their jobs.	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs). The plan's employment strategy seeks to limit new employment generating uses to existing employment sites, the city and district centres and sites in lawful use for the proposed employment use class and introduces a generally permissive approach in relation to housing delivery across the existing employment site network.

Draft policy	Topic	Summary of comments	Response

Chapter 3	Support commitment to inclusive growth	Support commitment to inclusive growth, where wealth is distributed and all citizens can share the benefits of growth. Would like to see this commitment more strongly and explicitly in the plan.	Support noted. Policies E3 and E4 provide policy support for inclusive growth in the plan.
Chapter 3	Supportive	Cyclox support all policies in this chapter	Support noted.

Chapter 4 - A Green Biodiverse City that is Resilient to Climate Change

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Headlines for Chapter 4:

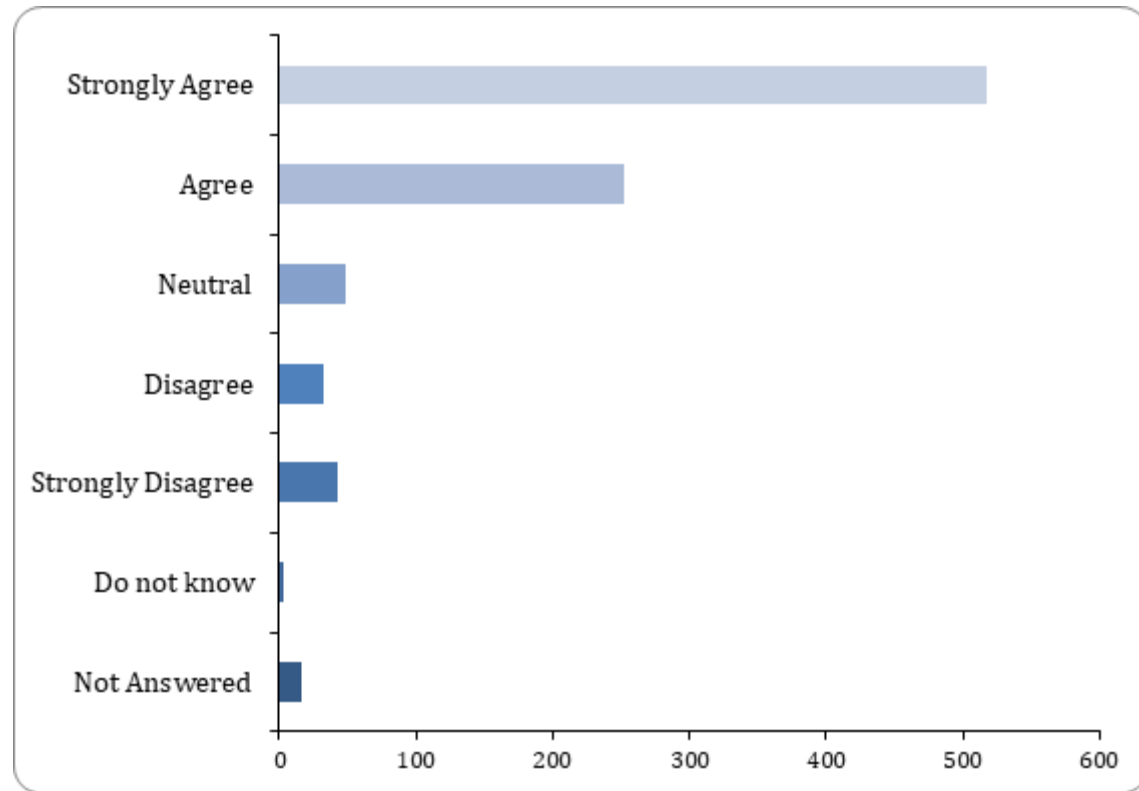
- Consensus regarding the importance of Oxford’s network of green spaces to the character and setting of the city as well as the well-being of its inhabitants and for climate resilience
- Green spaces are a finite resource, not easily re-created when lost or damaged
- It should be explicit that greenfield will only be developed if no brownfield sites are available or meet needs
- Lots of support for initiatives and policies that protect the environment and creation of additional green spaces
- Push to work with local wildlife groups to maintain and enhance and educate people about local wildlife
- New developments must be constructed to latest green and sustainability standards and flooding
- Mitigating flooding and sewage issues should be prioritised

Short Questionnaire Responses

Green Spaces

We are protecting our important green spaces and features. We are also requiring biodiversity enhancements and new green features on sites. To what extent do you agree with this approach?

There were 894 responses to this part of the question.

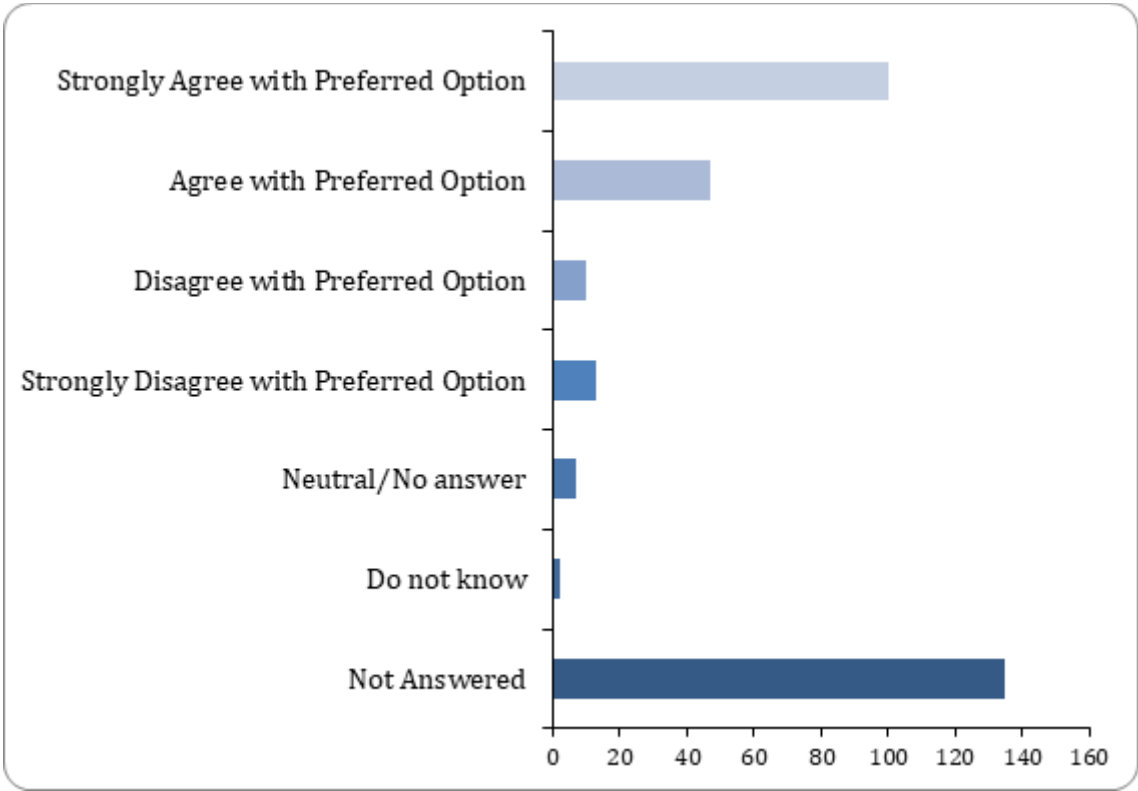


Option	Total	Percent
Strongly Agree	517	56.75%
Agree	252	27.66%
Neutral	48	5.27%
Disagree	32	3.51%
Strongly Disagree	42	4.61%
Do not know	3	0.33%
Not Answered	17	1.87%

All Public Responses – Draft Policy G1

Please tell us what you think about the policy options set 005a (draft policy G1): Green Infrastructure Network and Features.

There were 179 responses to this part of the question.



Option	Total	Percent

Strongly Agree with Preferred Option	100	31.85%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	10	3.18%
Strongly Disagree with Preferred Option	13	4.14%
Neutral/No answer	7	2.23%
Do not know	2	0.64%
Not Answered	135	42.99%

Draft policy	Topic	Summary of comments	Response
G1	Ambiguity in policy wording	As drafted, the policy suggests that parts of the hospital sites may constitute land in category G1C: All other Green and Blue Spaces. These areas form undeveloped land within a 'Key Employment Site'. These areas could be critical to securing employment floorspace, or other important hospital requirements. It is therefore unreasonable to ascribe a level of protection that would prevent development delivery. The Trust therefore suggests that Key Employment Sites are given additional consideration or dispensation in the proposed policy. Draft Policy G1 also introduces extended criteria for tree loss, now requiring evidence of tested alternative layouts to preserve trees (apparently regardless of quality), as well as general evidence that these have been minimised in accordance with BS 5837:2012. The Trust considers the current drafting of this provision in Policy G7 of the adopted Local Plan remains sufficient. Requiring extensive evidence for all trees as proposed – regardless of quality – adds disproportionate burden. BS.5837:2012 already embeds a structured, evidence-led approach which must be taken into account in planning	The categorisation does not preclude development proposals coming forward, and it will be made clear in the policy/supporting text that reversion can be made on a qualitative as well as quantitative basis, which allows consideration for improved or more functional green features even where the footprint is reduced (see policy G3). A requirement for 'like for like' alternatives will mainly be applicable in situations involving specific function (e.g. sports pitch, play space etc.), which will also be outlined in the final policy wording/supporting text. The policy criteria with respect to tree loss follows the current adopted policy approach and also takes into consideration the Urban Tree Canopy

		applications and design of development that does not need to be repeated in local policy.	standard contained in the Natural England GI framework.
Draft policy	Topic	Summary of comments	Response

G1	Unjustified as surplus requirements not considered	In the case of Core Green and Blue Spaces, the proposed policy does not allow the loss to be balanced against the public benefits of the proposal, thereby setting a higher test than national policy. Moreover, the policy does not enable surplus requirements to be taken into account, thereby preventing the redevelopment of any underutilised greenspaces e.g. sports facilities in the future. In comparison, the NPPF (Paragraph 104) sets out protection for greenspaces unless they are surplus or can be reprovided. In the case of Supporting Green and Blue spaces, harm can only be mitigated by ensuring reprovision either to the same standard or higher. Again, this fails to take into account surplus requirements, or any other public benefits which may outweigh the harm caused. In addition to the concern that the reason for designation is not evidenced or necessary, institutions should be given a freer hand to plan their estates having regard to broader planning objectives when applying for planning permission.	Any development proposals with the potential of affecting 'Core' designated green spaces would at the minimum be required to demonstrate that they do not result in loss or harm, and that the proposed uses are complimentary, compatible or provide enhancement to the designated spaces. In a situation where facilities such as sports pitches (typically categorised as 'Supporting' GI) are within a Core designated space, it is likely because such a space also performs a core function in the GI network, such as active flood storage, or forms part of the setting of a designated heritage asset. Categorisation as a Supporting GI space does not preclude development proposals coming forward, and it will be made clear in the policy that reprovision can be made on a qualitative as well as

Draft policy	Topic	Summary of comments	Response
			quantitative basis (see policy G3) - the requirement for 'like for like' reprovion will mainly be applicable in situations involving specific function (e.g. sports pitch, play space etc.). The determination of what facilities may be deemed as surplus will be made on the basis of assessments by relevant departments in the council.

G1	Supporting green spaces should have more protection	Supporting Green spaces that are within the inner parts of the city should be protected from development to avoid a future in which the impact of the urban heat island effect gets ever worse. For example, the green spaces to the north of Cowley Road that are currently sports fields have been included as proposed site allocations, even though they play a vital role in all of the above aspects, and are adjacent to one of the least green parts of the City, East Oxford, which already suffers very high summer temperatures during heatwaves. If despite our concerns such sites are taken forward as site allocations, or have planning applications for development on them, we consider that it is essential that there is policy in place that means that there must be a minimum of 50% green space (in addition to gardens within the urban development), including a variety of habitats	Green spaces categorised as supporting spaces will only be considered where any harm or loss is mitigated by replacement to the same standard or higher. Additional evidence will be required from applicants that broader considerations are taken into account specifically for sports facilities and amenity spaces – including a demonstration that spaces can be reprovided in such a way that there are no deficits against demand, opportunities are taken for suitable alternative provision where that is appropriate, or that

Draft policy	Topic	Summary of comments	Response

		including trees, and wetlands, which will benefit both wildlife and people. Whilst some areas of the green space could be accessible, a significant proportion (except on the very smallest of sites) should be set aside as a nature reserve with high quality natural habitats and an in-perpetuity management plan, managed through a CIC, Trust or similar. The nature reserve part of the green space should be screened to reduce disturbance to wildlife but could be enjoyed by people through viewing areas and depending on their scale, footpath networks. BBOWT greatly welcome the preferred option, particularly the text: “All spaces in the network would be treated with equal protection, based on presumption against any net loss (because being a part of a network means that it would be challenging for them to be replaced elsewhere).”	consideration has been taken of any specific local needs, or particular deficiencies in a type of space. Open public spaces (parks, playgrounds etc) will only be deemed surplus to requirements if it is identified as such by relevant departments in the city council like the communities and parks teams.
G1	Disagree with supporting green space classification	Disagree with Headington Quarry Park, Barton Road Park, Ruskin Fields among others being downgraded from ‘Core’ to ‘supporting’ green spaces, giving them little protection. Emphasise the benefits to public wellbeing, especially for local young people.	Core spaces are designated as such because of fundamental characteristics that make their reprovision impossible or impractical, which in practice often applies to designated ecological sites (e.g. SACs, SSSIs etc), flood storage, designated heritage sites etc.

			While supporting spaces may not have

Draft policy	Topic	Summary of comments	Response
			statutory designations, they still play important roles for public amenity and wellbeing, as well as environmental functions. Core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces').

G1	Objection to tiered GI	The proposed wording is a deviation from Policy G1 of the adopted Local Plan, which does not rank Green Infrastructure and confirms that planning permission will not be granted for development that would result in harm to the Green and Blue Infrastructure network, except where it is in accords with relevant mitigation or exceptions identified in supplementary policies. Based on the above, this policy wording and allocation methodology is objected to for a number of reasons: 1. The allocation for Core and Supporting arbitrarily draws a line between one and the other, without any reasonable balance being provided to a sliding scale of quality both internally within individual Green Infrastructure, or when comparing the lowest quality Core against the highest quality Supporting.	The NPPF includes a requirement for plans to distinguish a hierarchy of nationally and locally designated sites, to allocate land with the least environmental and amenity value, and to take a strategic approach to maintaining a network of green infrastructure (para 188). The proposed hierarchy in the policy is consistent with the approach required by national policy and has a framework for how it applies to the Oxford context. Core spaces are designated as such because of fundamental characteristics that make their

Draft policy	Topic	Summary of comments	Response

		2. The assumption that Core 'spaces cannot be moved/re-provided sufficiently without compromising the overall character and function' is subject to each site's individual merits and proposals. For example, Core areas may have lower quality sub-areas within them. This conclusion should not be drawn at this stage and result in a blanket in-principle ban on development within designated areas. 3. The proposed wording conflicts with the aim of the policy as outlined at Paragraph 4.6 as outlined above, which seeks to protect Green Infrastructure from 'inappropriate development', requiring mitigation where development comes forward. 4. The Core policy wording has no flexibility for the scale of green or blue infrastructure, scale of existing and proposed development, exceptional circumstances, or the possible wider re-provision or enhancement of the infrastructure. The following updates are requested: 1. The principle of 'Core' and 'Supporting' be removed, in line with Option A of the Background Paper, as well as the approach currently within the adopted Local Plan. The overarching policy wording should seek protection, but acknowledge that the loss may be justified	reprovision impossible or impractical, or their loss will have a significant adverse impact to the character or GI network of the city. In practice the designation will apply to designated sites (e.g. SACs, SSSIs) or sites of heritage significance or scheduled sites. Other national policy considerations will also apply to such sites. There are no situations envisaged whereby planning permission that results in loss or harm to such spaces would be acceptable. Any development proposals with the potential of affecting 'Core' designated green spaces would at the minimum be required to demonstrate that they do not result in loss or harm, and that the proposed uses are complimentary, compatible or provide enhancement to the

		subject to adequate re-provision or enhancements, and / or sufficient	

Draft policy	Topic	Summary of comments	Response
		justified evidence of the need for the development in the context of wider site function and use. OR 2. Alternative policy wording for Core sites, with the allowance for development in 'exceptional circumstances', as recommended by Option B of the background paper.	designated spaces. Formulating 'exceptional circumstances' will be a subjective exercise and run risk of deprioritising spaces that may still bring about benefits

G1	Justification unclear	The grounds of Mansfield College are categorised as Private Open Space (group G1B). The justification behind this categorisation is unclear especially as many other smaller areas of space associated with other colleges are not categorised in the same way. The background paper sets out reasons why sites may be categorised as important Green infrastructure including biodiversity reasons, heritage reasons or climate change reasons. There is no assessment on the biodiversity of the site, it doesn't appear to be recorded as important from a heritage point of view (acknowledging that the adjacent buildings are listed), nor is the site within the floodplain. For Category G1B sites the policy allows for planning permission to be granted where any harm/ loss is mitigated through 'sufficient reprovion', although this is not defined. The policy also identifies that this should be on site. There is no consideration in the policy for those sites which have restricted space and no other options for development opportunities, such as	The categorisation of a green space or feature as G1B (supporting) can depend not only on specific functions but other considerations such as user amenity, relationship to and impact on the setting of other buildings etc. The categorisation does not preclude development proposals coming forward, and it will be made clear in the policy that reprovion can be made on a qualitative as well as quantitative basis, which allows consideration for improved green features even where the footprint is reduced (see policy G3). A requirement for 'like for like' alternatives will mainly be applicable in situations involving specific function (e.g. sports pitch, play space etc.), which will

Draft policy	Topic	Summary of comments	Response

		Mansfield. The competing need of the College and the Council's desire to retain green spaces which are not accessible to the public could be considered to sterilise the College's ability to meet the needs of its students, particularly in relation to student accommodation.	also be outlined in the final policy wording/supporting text.
G1		Ok. But exercise judgement. There are too many college sports grounds only used a little. If one were to become a car park that would be a good thing. Never say never.	Comment noted.
G1	Objection to approach	This consultation fails to identify or map a network of Oxford's green blue infrastructure. This is a significant omission which affects the validity of the consultation and which cannot be justified given the existence of the longstanding Green Infrastructure Report (2022) and the availability of the results of the Local Nature Recovery Strategy consultation responses report (January 2025) and liaison with the LNRN. An interim consultation which maps Oxford Green Blue Infrastructure and includes findings from the LNRS must be undertaken prior to any Reg 19 consultation. Oxford's green space network should encompass and connect all of the existing green - blue infrastructure in the city and identify sites where	An interactive policies map including layers showing the GI network was published by the launch of the Reg 18 consultation, and links to it were provided on the council webpages and consultation materials which all remain active. Improvements to the public interface will be made in response to user feedback on a continuous basis. The NPPF includes a requirement for plans to distinguish a hierarchy of nationally and locally designated sites, to allocate

		new genuine brownfield development can connect	land with the least environmental and
Draft policy	Topic	Summary of comments	Response

		with this network. In addition, Oxford's nature network should connect with green infrastructure beyond the city boundaries. This policy should include the Oxford Earth Academy work on the Oxford Education Nature Park. There should be a presumption against any loss of trees, hedgerows and woodland. No losses should only occur except in truly exceptional circumstances e.g.: safety. All Green space should be protected; there should be no hierarchy. The preferred option requires identification/designation of green and blue infrastructure sites for protection. You suggest a hierarchy of protection for spaces within the Green Infrastructure network of green spaces, in which ecological function takes priority over recreational/health functions. In the last GI study, Bertie Park was cited as an example of a small, but multi-functional site. In spite of the fact that it is a highly valued community space, it would be at the bottom of the hierarchy. You state that planning permission will only be granted for proposals relating to sites at the bottom of the hierarchy "where any impacts are	amenity value, and to take a strategic approach to maintaining a network of green infrastructure (para 188). The NPPF also sets out the strict conditions for when loss of open space, sports land/buildings and pitches can be lost (para 107). The proposed hierarchy in the policy is consistent with the approach required by national policy and has a framework for how it applies to the Oxford context. The hierarchy consists of three levels of protection. The core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces'). The conditions for approving development affecting supporting spaces (G1B), such as Bertie Park, will

		mitigated by ensuring sufficient reprovision, ideally onsite, and to the	be required to sufficiently reprovide affected

Draft policy	Topic	Summary of comments	Response
		same standard or higher, or if it can be demonstrated in the application that current provision is surplus to requirements." There is no detail on how you determine whether a site is "surplus to requirements". Draft policy "would seek to protect all public and private green infrastructure in the city from inappropriate development and ensure that, where it comes forward, development mitigates any potential impacts." "Seek" means that you are not necessarily going to protect GI, and if it comes forward for development, instead of replacing recreation spaces with equivalent or better, you make clear your intent to "mitigate any potential impacts." The following statement is even worse: "the draft policy also sets out conditions by which certain types of green space may be lost to other forms of development, however, there may also be additional considerations which would apply to applications that affect certain types of spaces including how these might need to be reprovided." You claim to clarify this in section 4.2 where you actually make clear your intention to depart from national guidance with reference to Parks and gardens, accessible greenspace	spaces to the same standard or higher and the approach aligns with national policy. The policy wording and supporting text will set out the means by which the standard of re provision will be assessed. Open public spaces (parks, playgrounds etc) will only be deemed surplus to requirements if it is identified as such by relevant departments in the city council like the communities and parks teams.

		and amenity greenspaces: "Where relevant, applicants will have to demonstrate consideration of how any	
Draft policy	Topic	Summary of comments	Response

		loss can be mitigated, especially if this is located in an area which already suffers from a deficit." How would OCC determine whether a mitigation in an area which already suffered a deficit was adequate? OCC needs a clearly stated policy reflecting national guidance, which protects our recreational spaces, especially in working class areas.	
G1	Option A and low quality green spaces	Whilst supporting option A generally, disagree with option A's wording: <i>This would allow us to release poorer quality spaces for other needs.</i> Question who assesses this and what is factored into it? All green space should be protected, and brownfield land should be prioritised. TPOs cannot protect trees alone and TPO protection can be invalidated (e.g. if signs of sickness in tree). Do not allow mature green healthy trees to be felled for development. Do not agree with option D's wording that additional tree protections beyond TPOs could be considered too onerous.	The highlighted wording is from a section of the supporting background paper that contains possible opposing arguments to adopting the preferred option. Our response to this line of argument is contained in the same section.
G1	Mitigation against loss of trees	It should be acknowledged that mitigation against loss of existing mature trees and hedgerows is often inadequate, simply replacing with new trees or hedges will not replace the existing biodiversity.	This policy and others in the plan (G2, G3, G6) incentivises the retention of existing green infrastructure and natural features in development proposals and limits the loss of established features such as

Draft policy	Topic	Summary of comments	Response
			mature trees and hedgerows to exceptional circumstances in line with Government guidance and substantial evidence backing or mitigation arrangements.
G1		Strongly agree with protections for green spaces. I would adjust the policy slightly to reflect a 'biodiversity first' approach, for example where you allow for the removal of living trees, instead of saying, "...where it is clearly justified" gives space for putting developers' concerns above the concerns of our lessening biodiversity. Perhaps this could be reworded to say, "Loss of woodlands, hedgerows and trees is not permitted. In situations where this is unavoidable, there must be two full ecological surveys to show two opinions, and there must be a rewilding plan for biodiversity gains, with an appropriate assigned ongoing plan and budget for supporting the establishment of a the new green area."	The circumstances where the loss of trees are highly limited in the policy and will be subject to justification by substantial evidentiary backing and mitigation arrangements. Other plan policies such as the greening factor (G3) and BNG (G6) policies also incentivise the retention of mature green infrastructure features, which in themselves contribute greatly to policy compliance where they are retained.

G1	Protection of green space around designated sites	Major national sites of biodiversity importance (SSSIs SACs), and arguably local biodiversity sites also, should never have adjacent lower quality green land developed – important for buffering and supporting function of these sites. For example: can be crucial in rainwater supply to fen springs in SSSI/LWS fens hundreds of metres away.	Policy G6 sets out the requirements for the avoidance of adverse impacts on designated sites, including requirements for distance buffers. The policy wording and supporting text includes references to studies produced

Draft policy	Topic	Summary of comments	Response
			by the council, Natural England and others, and applicants will also be required to demonstrate that they have taken into consideration the recommended actions in their schemes.
G1	Protection of local biodiversity sites within G1 network	Draft policy protects only the sites which already have legal protection I.e. SSSIs and SACs. Local sites should be protected in same way as sites that are already nationally designated. Loss of local wildlife sites cannot be mitigated in respect of the biodiversity functions that are lost.	This is incorrect, draft Policy G1 includes all locally designated sites that form a part of policy G6's ecological network as 'core' parts of the network (because these functions cannot be easily reprovided). This includes the LWSs, OCWSs and LNRs.

G1	Policies in neighbourhood plans	Green Spaces and Biodiversity policies of Headington Neighbourhood Plan have been ignored – would be a useful basis for the policy.	Policies for the local plan are developed on the basis of a broad evidence base and consultation, which have to be coherent as a whole and applicable to all areas and sectors of the city with as few exceptions and caveats as possible. Local plans policies also carry more weight than neighbourhood plan policies unless the latter cover issues that are not addressed in the local plan.

Draft policy	Topic	Summary of comments	Response

G1	Scope of policy too wide	Treating every green fragment as sacrosanct, with a presumption against any net loss simply because it sits inside a city-wide “network”, locks low-value, poorly located scraps of land into perpetual idleness and blocks the gentle infill Oxford needs. The draft G1 text even classes the smallest “supporting” and “other” spaces alongside the historic flood-meadows under the same nearabsolute protection. That would make it far harder to swap a redundant verge or disused private lawn for new homes plus a better-designed pocket park nearby—an outcome the NPPF explicitly allows where open-space quality is improved. A calibrated, site-by-site designation (Alternative 1) still gives strong, tailored safeguards to the genuinely strategic assets (core floodplains, SSSIs, heritage gardens, main sports pitches) while letting modest, ecologically poor plots be upgraded or relocated if a scheme secures equal or higher amenity and biodiversity value.	Small green spaces have the potential to bring about local amenity and environmental benefits, which can be cumulative across a wider area where they can be linked. For the city as a whole the cumulative benefits are best harnessed when green spaces are considered as part of a coherent network. As a spatially constrained city with limitations on the amount of significant new green spaces within its boundaries, the retention of green spaces is even more important. The network approach is also in alignment with the NPPF. The policy approach does not preclude development in suitable locations, although the emphasis is on the development process becoming a way for the delivery of enhanced/improved green infrastructure.

G1	Residential Garden Land	Policy should generally prevent creation of nonpermeable surfaces especially on house	An Article 4 direction requires a specific broader process that is

Draft policy	Topic	Summary of comments	Response
		frontages in favour of guaranteed SUDS or other green areas – to allow rainfall penetration and mitigate impacts on drainage systems in relation to flood risk. Policy should go further and not allow SuDS either in Lye Valley catchment as this is not sufficient to mitigate loss of natural surface cover. Can Article 4 permitted garden development rights be removed within the defined catchment area of the Lye Valley?	led by the wider council and outside of the local plan framework. Qualifying schemes will be subject to the UGF requirements of policy G3, which is intended to incentivise the integration of natural surface cover. However the methodology is simple to use and developers at all scales and types will be encouraged to apply it on their schemes. Policy G6 addresses the protection of the ecological network including the Lye Valley SSSI.

G1	Residential Garden Land	We support most of this policy but have concerns about the consequences of the policy to allow building on residential garden land. We would like to see a requirement for consultation/engagement with surrounding residents, beyond what is generally required, as in some locations this may have a significant impact upon the amenity of nearby homes. We would like to see further creativity when building on residential garden land, to explicitly off-set by creating further green corridors with pocket parks, community gardens/tiny forest gardens in areas of	This aspect of the policy is more likely to apply to be applicable in built up areas that are already previously developed and not under any GI designation. In any case any proposals will be expected to be compliant with the requirements of all relevant policies.

Draft policy	Topic	Summary of comments	Response
		social/green deprivation, which will have multiple positive effects including health, happiness, food growing, carbon sequestration and enhancement of biodiversity. This should be an essential prerequisite when paving over/ building on any garden spaces.	

G1	Objection - Re-provision	The policy is unsound and ineffective, as it is mathematically impossible for a development which reduces green space, to “reprovision” elsewhere, which is also green space. The term is not explained in the glossary. Green space in allocated sites is not even marked as such, it does not even officially exist.	The requirements for reprovision and the basis on which it may be considered acceptable will be described in the policy wording and supporting text. Reprovision can be made on a qualitative as well as quantitative basis, which allows consideration for improved green features even where the footprint is reduced (see policy G3). A requirement for 'like for like' alternatives will mainly be applicable in situations involving a specific function (e.g. sports pitch, play space etc.). Site allocations will have specific requirements in relation to green infrastructure provision,

Draft policy	Topic	Summary of comments	Response

			which will be site specific – where green spaces already exist, they will be identified in the policy wording along with guidance on where they can be retained or enhanced. Other relevant policies will apply in addition.
G1	Objection – Residential Garden Land	The conflict between Residential gardens in designated green space protections in Policy G1 must be resolved in favour of Green Space protection, or Core Green space could be lost where land is in both as in the Lye Valley example above. • G1 - It is unclear whether designated green space designation prevails over residential garden building in policy G1 • G1 - para b) is entirely redundant.	This aspect of the policy is more likely to apply to be applicable in built up areas that are already previously developed and not under any GI designation. In any case any proposals will be expected to be compliant with the requirements of all relevant policies.
G1	Omissions in designated GI network	The Oxford draft local plan policy map identifies a number of sites around Osney Island designated as G1 (green and yellow – presumably corresponding to the G1A and G1B mentioned in the draft policies, p.66) and Greenbelt. However it crucially fails to recognise both the main river, from where it passes under the railway up to Botley Road, and the Osney	Blue corridors are already subject to strong protection through national policy, and other policies in the Local Plan (see policy G7 on flood risk). Banks to watercourses are addressed in requirements for policy G2 (10m buffers to watercourses). The expectation

		Stream, as part of the ecological network in the area. It is curious that the local	

Draft policy	Topic	Summary of comments	Response

		primary school and church are marked G1A (green) when the far more significant river network, including its banks, is not marked. This needs to be rectified and these areas should be designated G1A. We suggest the banks of the rivers are marked with a green line, and the marina and Osney Lock Hydro (currently missing from the map) are marked green. Members of the Osney community participated in the consultation last year on the County Council Local Nature Recovery Strategy (LNRS). As a result, both the main river corridor and the Osney Stream are marked green on the draft LNRS map – making them part of the nature recovery network. The draft Oxford local plan map is inconsistent with the draft LNRS map and should be brought into line with it. The suggestion of marking additional areas in green proposed in the previous paragraph would achieve this. We are concerned that a failure to clearly designate these stretches of river as G1A leaves them as ‘other spaces’ which could create ambiguities about whether the stated biodiversity policies, which we support, apply to this area.	is that this should ensure these spaces are not built upon and incentivises their renaturalisation where possible to improve the benefits they provide for people and nature. The LNRS mapping highlights suggested areas where habitat creation and improvement actions could be delivered to offer the greatest benefit towards local biodiversity priorities where opportunities arise. The elements in those maps play a different role to the designations under policy G1 and is therefore not something we are looking to completely mirror due to the differing purposes. Many of the Local Plan's protected spaces will be able to offer opportunities to support the types of measures the LNRS identifies, and we will continue to consider where it is possible to align with various elements

			of the LNRS and its general priorities as we further

Draft policy	Topic	Summary of comments	Response
			develop the Local Plan, even if this will apply in other policies other than G1.

G1	Objection – policy not effective – amendments suggested	There appear to be overlaps between the GI policies and also conflicts with the wider aspirations and proposed allocations of the Plan. Policy G1 refers to protection of green infrastructure (GI). The Plan defines core and supporting GI which is difficult to differentiate on the interactive policies map and will result in difficulties in interpretation given the scale of mapping involved. In addition, it is questioned how the land has been identified and defined, for example, areas within Christ Church that are shown as “core” GI are actually paths and compost bins. In addition, the policy is very strict and does not allow any loss of or harm to any Core GI. This is too restrictive. In relation to Supporting GI the policy requires re-provision ideally on site. It is hard to see how this can be achieved without demolition of buildings? Policy should be amended to provide some flexibility, especially given the inaccuracy in the mapping and assessment criteria and clarity provided around how the Council considers mitigation on site could be achieved. In relation to loss of trees on a site, it is not always possible to re-plant on the site and make efficient use of the land. As such some cascade to planting	Any development proposals with the potential of affecting ‘Core’ designated green spaces would at the minimum be required to demonstrate that they do not result in loss or harm, and that the proposed uses are complimentary, compatible or provide enhancement to the designated spaces. Formulating ‘exceptional circumstances’ will be a subjective exercise and run risk of deprioritising spaces that may still bring about benefits. Categorisation as a ‘supporting space’ does not automatically preclude development proposals coming forward, and it will be made clear in the policy/supporting text that re-provision can be made on a qualitative as well as

Draft policy	Topic	Summary of comments	Response
		trees nearby should be considered. As drafted the policy is not effective and will impact on the wider development policies in the plan seeking to make efficient use of land. It would make sense to combine the criteria in this policy with those in policy G6. Suggested Amendment: 1. Provide more detailed mapping to accurately define the location of the GI features and change the colour coding to better differentiate between the categories. 2. Provide more flexibility in the policy to ensure it takes a positive approach to development. 3. Consider combining the policy with Policy G6.	quantitative basis, which allows consideration for improved or more functional green features even where the footprint is reduced. Creating a standalone G1 policy as opposed to consolidation with G6 is considered to be a more effective way of addressing the wide range of green spaces that may warrant protection on grounds other than biodiversity or ecology, such as heritage significance, local amenity etc. The policies map is under constant review and improvements in accuracy and usability are made on an ongoing basis following user feedback, which is always welcomed.

G1	GI within Key Employment Sites/ future site allocations (ARC)	The undeveloped plots at ARC Oxford (Plot 3000; 8200/8400; and 9200) may constitute land within the G1C category. These plots form undeveloped land within a 'Key Employment Site'. These sites (and the consented proposals at Plot 2000) are	The policy approach behind the G1C is consistent with NPPF approach. Spaces in this category are likely to be fragmented, smaller or have

Draft policy	Topic	Summary of comments	Response
		critical to securing employment floorspace. It is unreasonable to ascribe a level of protection that would prevent these coming forward. ARC requests these sites are excluded from the G1C space designation, or any other designation that would undermine their status.	other characteristics that reduce their multifunctionality in a GI network context. This categorisation does not preclude development if it is demonstrated that there is re-provision or that the space is surplus to requirements, as appropriate to the application.

G1	"Loss of trees" criteria too strict	Do not support introduction of "extended criteria" for tree loss set out in G1 that requires evidence of tested alternative layouts to preserve trees (regardless of quality), as well as general evidence that these have been minimised in accordance with BS 5837:2012. Extant Policy G7 (OLP2036) remains sufficient. Requiring extensive evidence for all trees as proposed (regardless of quality) adds a disproportionate burden. BS.5837:2012 already embeds a structured, evidence-led approach which must be taken into account in planning applications and design of development that does not need to be repeated in local policy.	The policy criteria with respect to tree loss follows the current adopted policy approach and also takes into consideration the Urban Tree Canopy standard contained in the Natural England GI framework.
G1	Loss of Tree criteria not strict enough	We also have concerns about the tree policy in 4.1.e) which sets the replacement of lost trees at "minimum of no net-loss of tree canopy cover".	The policy criteria with respect to tree loss follows the current adopted policy approach and

Draft policy	Topic	Summary of comments	Response

		We feel that this is not ambitious enough due to the important role played by trees in nature recovery and climate mitigation. The policy could be replaced by a minimum of 1.5 times the amount of tree canopy lost. This is also particularly important when planting new trees, as many will be lost due to extreme climatic fluctuations, so to plant ambitiously and hopefully is to be encouraged.	also takes into consideration the Urban Tree Canopy standard contained in the Natural England GI framework.
G1	Exemptions of private spaces	The City should focus on areas, such as parks, which are owned and managed by the city. Private developments should not be subject to so-called green planning permission requirements.	All green spaces in the city, particularly those that perform ecological functions such as flood storage and biodiversity sites, have a cumulative impact on the natural environment of the city whether or not they are public or private., which makes it prudent to have policies that address how development affects them. It is also a requirement of national policy to have an approach in place.
G1	Recommended amendments to strengthen policy	The policy could be further strengthened by: - specifying minimum buffers for ancient woodland and other irreplaceable habitats - setting an overall canopy cover target for the Oxford City Council area	

		- requiring that new planting is from suitable species and UK sourced for biosecurity	

Draft policy	Topic	Summary of comments	Response
		- targeting new planting at areas prioritised in the Local Nature Recovery Strategy and/or of low tree equity. The Oxford Urban Forest Strategy made the connection between areas of deprivation and low tree cover. That connection is mapped further in the UK Tree Equity scorecard and map https://uk.treeequityscore.org/ which identifies the neighbourhoods in greatest need of new tree cover. We recommend this approach be integrated into the Local Plan.	

G1	Strongly disagree with preferred option	What will happen to sites which are not to be considered part of the Green Infrastructure Network? You say that you intend to go beyond the requirements of the NPPF. Green spaces are covered by the NPPF “golden rules” (s.156-7). These don't mention reprovion, so talk of mitigation may be appropriate, however NPPF s.104 which covers public open space has very specific requirements requiring not mitigation, but reprovion of open space. The wording of NPPF s.104 should be reproduced in the 2042 plan. You propose identifying a network of GI/BI sites for protection. The spaces “to be most strongly protected are those that provide a multitude of functions.” This is logical. The list of functions is long: Accessibility, Tourism, Heritage, Food	The policy approach is based on a hierarchy of protection for green spaces, with a requirement for reprovion of spaces identified as Supporting GI (which includes recreation and sports grounds) ideally onsite. The wording is consistent with the NPPF. Spaces identified as Core GI are so because they have functions that are specific to that site and cannot be replicated or reprovioned anywhere else, e.g. functional flood plains,

Draft policy	Topic	Summary of comments	Response

		production, Formal sports, Children’s play, Youth facilities, Tranquillity, Biodiversity, Carbon storage, Climate change adaptation. The local plan should use this list to inform development of sites, rather than as an excuse to shut them down. You suggest a hierarchy of protection for spaces within the Green Infrastructure network, in which ecological function takes priority over recreational/health functions. Firstly, recreation space should not be at the bottom of the hierarchy. Secondly, the local plan should not require mitigation for loss of recreation sites. It should reproduce the wording of NPPF s104. Conflating green and public open space results in vagueness of statements such as those underlined below: “limited opportunities to provide new space means that loss of existing green features needs to be <u>carefully considered</u> and <u>resisted wherever necessary</u>” and “sets out conditions by which <u>certain types of green space</u> may be lost to <u>other forms of development</u>, however, there <u>may also be additional considerations</u> which would apply to applications that affect <u>certain types of spaces</u> including how these might need to be reprovided.” Such statements could be used to support any decision.	designated sites (SSSIs, SACs) etc. Open public spaces (parks, playgrounds etc) will only be deemed surplus to requirements if it is identified as such by relevant departments in the city council like the communities and parks teams.

Draft policy	Topic	Summary of comments	Response
		The local plan should clarify the criteria which will be used to determine whether GI is expendable.	

Statutory Consultee Responses – Draft Policy

G1

Natural England

Draft Policy	Summary	Response	Outcome

G1	Welcome identification/protection of those spaces forming part of the Green Infrastructure core network G1A and G1B. Encourage Council to include existing green infrastructure features such as irreplaceable and priority habitats in addition to ancient woodland, veteran trees and important hedgerows, within the protected network. Flag that the Green Infrastructure Framework Principles and Standards for England should be used to help meet NPPF requirements for GI. They include recommended standards to inform policy for the quality and quantity of multifunctional green space including the production of GI Strategies, access to natural	Thanks and welcome the support. We consider that irreplaceable habitat is sufficiently protected through national policy and policies of the Plan refer to this elsewhere. Significant areas of priority habitat are located within areas that are protected by the core network, as well as on the ecological sites. Policies G1 and G6 then set out requirements where development impacts priority habitat elsewhere. We have referred to the GI Framework in drafting the Local	No further action proposed at this time.
Draft Policy	Summary	Response	Outcome
	green space standards, urban greening factors and good design principles.	Plan, including incorporating the Urban Greening Factor into local policy.	

G1 and site allocations	Note that several proposed site allocations impact on the GI Core network, particularly on G1B assets. Suggest that site allocation policies impacting G1 spaces include an estimate of the likely quantity of sufficient on site GI reprovision required to mitigate for any losses, the type of reprovision required and if it is not possible to provide the reprovision on site, then identification of options/locations for offsite delivery to another part of the network within the city.	It is not possible to accurately estimate this at plan-making stage as it is highly dependant of the detail of any subsequent application. The allocations will make clear where they include parts of designated GI network and that the requirements of policy G1 apply. Where possible we will suggest ways that applicants could meet the requirements.	Ensure relevant allocations flag presence of GI network and where possible set out broad suggestions for meeting the requirements of policy G1 where a proposal would impact these spaces.

Draft Policy	Summary	Response	Outcome
G1	Policy G1 - Figure 4.1 – Sport England is concerned that the hierarchy proposed in Figure 4.1. Playing fields should be protected from development, change of use or development	The Plan sets out criteria by which development proposals are to be assessed. The policy approach is to resist the loss of supporting spaces (including	No further changes proposed.

	should only be accepted where the tests in paragraph 104 of the		

Sports England

Draft Policy	Summary	Response	Outcome

	NPPF are met. Figure 4.2 – Sport England has the same concerns with this suggested policy text as it seeks to rewrite the clear tests in National Planning Policy Framework (paragraph 104). For example, it is welcome that the Council is updating its Playing Pitch Strategy. This is the appropriate document for assessing whether or not a playing field is surplus to requirements (paragraph 104). Sport England recommends that the Council reviews paragraph 103 and 104 of the NPPF and seeks to protect much needed sport and recreation facilities and identify new opportunities to meet needs. The draft policy fails to do this instead it appears to discuss how they can be removed rather than protected. Draft Policy G1 – the council needs to draft a new policy that conforms with paragraphs 103 and 104 of the NPPF, referencing existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, which the NPPF advises should not be built on. Sport England does not object to the Council having green infrastructure policies (see NPPF paragraphs 188 and 199 and the definition on page	playing fields, sports pitches etc) and the criteria are consistent with the requirements of paras 103 and 104 of the NPPF. The Plan is not intended to be an assessment tool for determining whether or not a space is to be considered surplus i.e. suitable to be lost with no reprovion. The Playing Pitch Strategy currently in development will be part of the evidence base that will provide a quantitative and qualitative analysis of current provision and expected need for such spaces in the city. Where proposed schemes affect supporting spaces, evidence will be required from applicants that broader	

		considerations are taken into account specifically	

Draft Policy	Summary	Response	Outcome
	73) but the Council must have robust policies in place that protect existing open space, sports and recreational buildings and land, including playing fields and formal play spaces. Built sports facilities and play areas also need protection from development and the plan requires a policy setting this out, not one that appears to support the change of use of these facilities for development.	for sports facilities and amenity spaces – including a demonstration that spaces can be reprovided with no deficits against demand, opportunities are taken for suitable alternative provision where that is appropriate, or that consideration has been taken of any specific local needs.	

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome

Policy G1 Protection of GI	Landscape and Nature Recovery – Biodiversity Local Plan Policies map shows some sites classed as G1A as located outside the city boundary (including some designated sites, but not all). Clarification is therefore requested to address this inconsistency.	Noted – we will look into this issue.	Oxford City Action: Investigate why designated sites are outside city boundary.

Draft Policy	Summary	Response	Outcome

	With regards to impacts on trees mentioned on pages 68 to 69, ecological enhancement of existing trees and woodland should also be considered for inclusion. It may also be important to refer to onsite compensation in advance or as soon as possible after the impact being preferable in this section through following the mitigation hierarchy including temporal and spatial considerations. Landscape & Nature Recovery– Landscape The policy primarily focusses on spaces shown on the policy map and less on the connecting role of green infrastructure features. As the Local Plan does not propose a specific tree policy, this policy together with G2 also has to ensure that existing trees and other important vegetation are	Policy G5 deals specifically within enhancing on-site biodiversity. Noted. Policy G5 also deals with enhancing on-site biodiversity.	No Action Required No Action Required. No Action Required.

Draft Policy	Summary	Response	Outcome

	adequately protected from development. It is recommended that the policy puts a greater emphasis on avoidance and mitigation of impacts on trees in line with the mitigation hierarchy before offering the option of compensation. Existing green infrastructure features e): the policy only requires no-net loss in canopy cover at 30 years. Does the policy not wish to be more ambitious especially in areas where canopy cover is low? The policy would benefit from more detail on what information is required when assessing the impacts on trees such a tree survey to BS5837:2012 standard and an Arboricultural Impact Assessment (AIA).	Noted. The policy has been informed by evidence. Noted. Separate guidance is included on our website about trees in the planning process.	No Action Required No Action Required No Action Required

Draft Policy	Summary	Response	Outcome
	The section on Residential Garden land focusses on the acceptability of developing gardens rather than the protection of the gardens as Green Infrastructure assets. The loss of structural garden vegetation to development including the creation of driveways for parking can have an adverse effect on green infrastructure connectivity between spaces of the GI network. Consideration should be given to whether this policy should also seek to address the protection of existing gardens. <i>“Planning permission will not be granted for development that results in the loss of other green infrastructure features such as hedges or ponds where this would have a significant adverse impact upon public amenity or ecological interest.”</i>	The NPPF requires us to define “residential garden land” for the purposes outlined in the policy. No proposed wording. No change proposed.	No Action Required No Action Required No Action Required

Draft Policy	Summary	Response	Outcome

	Information should be provided on how this is proposed to be assessed. County Council Property and Estates Team Oxford County Council Property and Estates Team owns various school playing fields and other sites, which primarily fall within the “Supporting Green and Blue spaces” category. Whilst Oxfordshire County Council Property and Estates Team endorses the aims of this draft policy, it is considered essential that a flexible element is included to ensure that Oxfordshire County Council Property and Estates Team will not be prevented from delivering their statutory duties which may, at some point, include the expansion of educational facilities or areas which may be better utilised for other purposes or alternative provisions.	Where additional information is needed to support policy implementation, this will be covered in an appropriate Technical Advice Note (TAN) Noted No alternative wording suggested. No change proposed.	No Action Required No Action Required No Action Required

Draft Policy	Summary	Response	Outcome

	Oxfordshire County Council Property and Estates Team also considers the requirement for reprovision of the Green/Blue infrastructure onsite to be overall onerous and should be removed to promote a greater flexibility that would promote sustainable development. Environment Team – Countryside Access There is no reference in this Local Plan to public rights of way, although there is an occasional reference to footpaths. Within the City area and vicinity there are numerous full public rights of way - and they need protection and enhancement and new links by means of unambiguous policies set out in the Plan. NPPF paragraph 100 states that 'planning policies and decisions should protect and	It is important to replace GI/ BI that needs to be re-provided close to where it was lost. We are not proposing to change this part of the policy. The County Council already includes an online resource for PRow/ footpaths etc. PRow are already protected through existing legislation (e.g.,	No Action Required No Action Required No Action Required

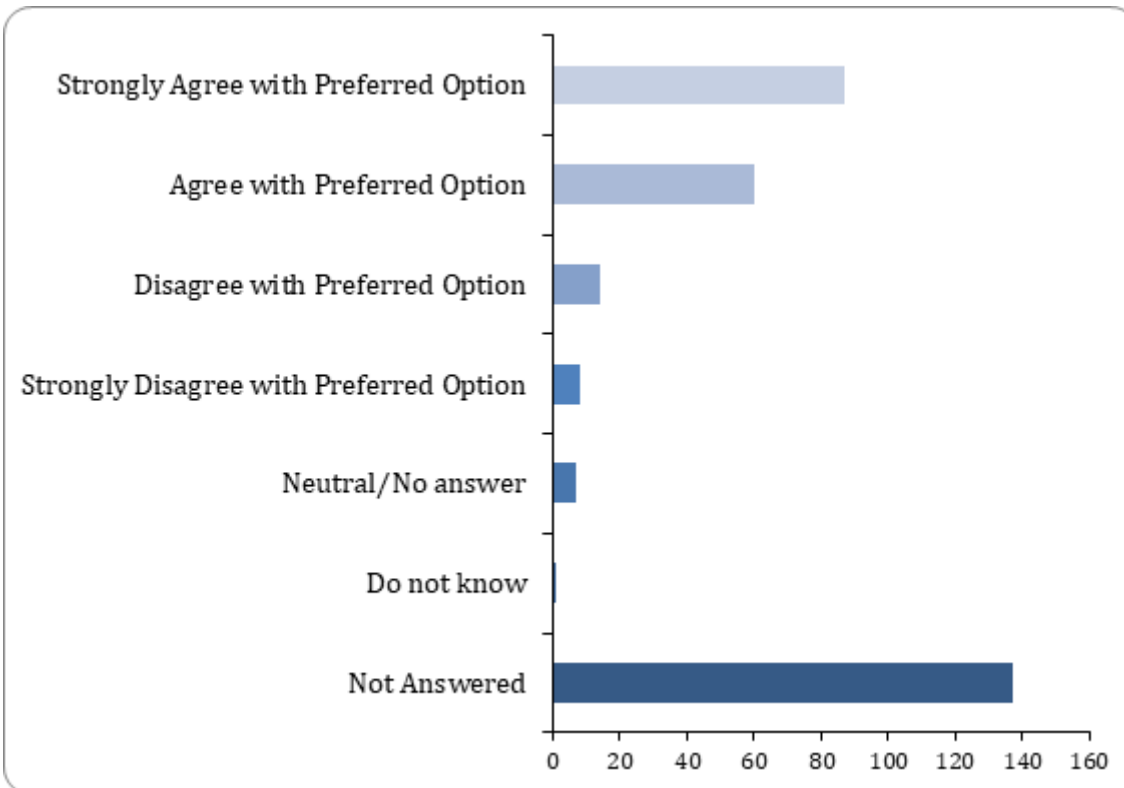
		Countryside and Rights of Way Act 2000, Rights of Way Act	

Draft Policy	Summary	Response	Outcome
	enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails'.	1990, etc). As such these do not need additional policy protection through the Local Plan. Known footpath/ rights of way enhancements required to mitigate the impacts of development proposed through the Local Plan should be set out in the IDP, relevant site allocation or area of focus policies.	No Action Required

All Public Responses – Draft Policy G2

Please tell us what you think about policy on Policy Option Set 005b (draft policy G2):
Enhancement and provision of new green infrastructure features.

There were 177 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	87	27.71%
Agree with Preferred Option	60	19.11%
Disagree with Preferred Option	14	4.46%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	7	2.23%
Do not know	1	0.32%
Not Answered	137	43.63%

Draft policy	Topic	Summary of comments	Response
G2	Support for preferred option	This could provide desperately needed green infrastructure links and their health and environmental benefits for the City, its quality of life, nature recovery etc.	Support is noted and welcomed.
G2	General comment	To balance new developments with green offsetting carbon contributions.	Comment noted.
G2	Clarification	The Draft Policy states that for residential sites of 1.5 hectares and above, new public open space of 10% of the area covered by residential development is required. It states that for mixeduse sites, the area of residential use should be used for that calculation. We request further clarification is provided, as to whether this new space should comprise hard of soft landscaping. It is assumed that by 'area', the Plan is referring to 'plot' area or building footprint, however it would be helpful for this to be clarified in the wording. It would also be helpful to clarify how to calculate in the case of buildings with nonresidential ground floor uses with residential above.	The requirement will apply to the overall plot area. The type of landscaping can be a design choice, however applicants are advised to take into consideration other relevant policies to ensure they are compliant with their requirements, e.g. the Urban Greening Factor policy and the Biodiversity Net Gain policy.

G2	Should be case by case basis	The preferred option for Policy G2 sets out that 'For residential sites of 1.5 hectares and above, new public open space of 10% of the area covered by the residential development is required. For mixed-use sites, the area of residential use should be used for that calculation'. [We] consider that requirements for Public Open Space should be considered on a case-by-case basis, taking into	A case by case approach risks inconsistent application which will hamper how we monitor the effectiveness of the policy, and will not give certainty to developers or local communities on what the open space provisions

Draft policy	Topic	Summary of comments	Response
		account site context and surroundings, on the basis that prescribed requirements may unintentionally suppress the quantum of housing delivery, contrary to overarching priorities for the Plan.	are. and a lack of certainty for developers on what the expectations.

G2	BBOWT	Support but would like this text added: “Require green and blue infrastructure features on all new development.....Require open space as percentage of site area on larger sites and all other new development to include green and blue infrastructure features.” For the policy to be effective we consider that clarity is required as to the definition of larger sites in order to ensure that the requirement for a percentage of site area to be open space is delivered. We would suggest that what is currently defined as major development (e.g. larger than 10 houses or equivalent) would define larger sites, and that 50% should be green space. A significant proportion of this green space should be nature rich, with some of it on sites larger than 1 hectare defined as nature reserve, with no access or managed access.	The policy will include a residential development site size threshold for which there will be a mandatory requirement for on site open space provision.
G2	General comment	Ok but only for academic and commercial. Housing the priority for development.	Comment noted.
G2	General comment	The problem is untrammelled development. Tokenistic inclusion of 'blue and green	Comment noted.

Draft policy	Topic	Summary of comments	Response
		infrastructure features' does not compensate for the loss of actual, functioning green spaces.	

G2	General comment	Much as I like the intent and idea here, I think we're deceiving ourselves if we take the approach that development won't have an overall deleterious environmental effect for the city, but we need to choose to do it anyway.	Comment noted.
G2	General comment	New developments take ages for vegetation to mature. Co2 absorption is so much more efficient with mature trees. Stop chopping down mature trees!!	Comment noted.
G2	Support for alternative option	Specific quality standards should be adopted as referred to in Alternative Option 1	Using a target such as described in Alternative Option 1 would not necessarily be effective as greenspace may not be evenly distributed, located close to centres of population, accessible, or of quality. Work on the Local Plan 2036 also identified the challenge of managing the provision of open space at a fixed ratio to population in Oxford as most developments are on small sites. It is therefore considered more effective to measure and provide

Draft policy	Topic	Summary of comments	Response
			greenspaces on a more localised basis.
G2	Support preferred option	Support the option but disagree that green features on sites can be designed in ways that allow them to perform multiple benefits for the local area particularly biodiversity. Biodiversity and human recreation never go together – overly used areas for recreation do not allow biodiversity to persist – trampling etc destroy habitat. Examples include hay meadows of New Marston Meadows SSSI; King Georges Field,	The requirement applies to provision on new development. We agree that multifunctionality works best if the uses are complementary and appropriate for the type of development.

G2	Policy requirements detrimental to development	Mandating bespoke green- and blue-infrastructure features for every development—on top of the Urban Greening Factor, biodiversity-net-gain rules and existing open-space levies—adds yet another cost layer that will either shrink site capacity or push build prices higher, eroding housing affordability. A rigid percentage of land for new open space on larger plots may look benign, but in a city where land trades at £5-10 million per hectare it effectively taxes every flat and lab bench, slowing supply and undermining the very climate goals it claims to serve. Oxford already benefits from extensive riverside corridors and historic parks; incremental, market-led greening (roof terraces, pocket gardens, tree-lined streets) will emerge where it enhances value without the need for another prescriptive policy.	The requirement for public open space is very carefully defined. It is particularly important in a densely packed city (where a lot of open space is not public) that, at the same time, there is access to open space. It is also important that the open space is of a sufficient size to be useable. Therefore, only the largest sites will be required to provide this. These sites themselves are generating new demand. It has been viability tested.

Draft policy	Topic	Summary of comments	Response

G2	Focus on minimizing impermeable surfaces	An important focus should be on the need for permeable surfaces and minimisation of impermeable surfaces which is very important for water management/flood risk management and can contribute to greening/bluing. 'The potential for these benefits is lost if there is an overuse of artificial, impermeable surfacing materials like concrete, artificial lawns and tarmac.' This needs to be explicitly specified for all proposed developments subject to planning applications and consideration given to use of impermeable surfaces in areas such as domestic front and back gardens	The policy approach is addressed in policy G3 (Urban Greening Factor).
G2	Increase thresholds for minimum greenspace requirements	We welcome the holistic factors in this list of enhancements to the GI and BI, and the fact that public access, connectivity and community food growing are included. We would advocate for further hierarchy or prioritisation of certain features. For example, addressing climate change should take priority over heritage and appearance. We would like to see the bankside ecological buffer zone of at least 15 metres (rather than 10 metres) to protect our essential BI. There should also be a sliding scale of "new public open space" so that 10% is a minimum, but with a prerequisite that in socially / green deprived areas this scale could be increased to ensure developers don't plan for too dense areas in areas	The 10% public space requirement in larger developments is intended as a minimum and there are no impediments to going larger. A sliding scale will make it difficult to implement a consistent approach across all developments – most potential development sites in the city already tend to be small or constrained, and often in built up contexts, which would make the delivery of usable open

		already lacking in green publicly accessible areas. Denser	

Draft policy	Topic	Summary of comments	Response
		areas however will be encouraged within areas with ample green public spaces.	space alongside needed development challenging.

G2	Maintenance of new GI features	We note that the developers will be responsible for maintenance of GI for only the first five years, but this should be with genuine engagement with the local community. Then there should be ongoing consultation around the maintenance of green spaces around residential/community buildings to allow for community maintenance - working alongside developers and owners (not just a legal contract in perpetuity which enforces site owners to take the most “efficient” management actions)	Maintenance and management plans are expected to be organised as part of the design/construction process at as early a stage as possible. There is scope in the policy for different options to be considered depending on the context of the application, including community stewardship arrangements where practical.
G2	Provision for Recreation	The “Raising the healthiest generation in history report” (RHGIH 2024) quotes MP Natalie Elphicke saying “[The NPPF] lists bats. Why are we not listing children?” It recommends that “any childfriendly approach should set out clear ‘quality asks’ and not create vague principles that add barriers to development and house building.” But the draft plan doesn’t even create vague principles. The only time that the recreational needs of children/youth (apart from in the contexts of private gardens and LTNs) are specifically addressed is in Figure 4.2. which deals with mitigation of loss. Recreation is an	Recreation for all ages and abilities is one of the multifunctional benefits of green spaces identified in the plan. The wording of the policy and supporting text will reflect this. Where there are statutory requirements for development, particularly with established assessment tools and metrics, they will

Draft policy	Topic	Summary of comments	Response
		afterthought. The recommendation is that “the provision of green and blue infrastructure are considered at the earliest stage in the design process” to offer “multi-functional benefits” which include health and wellbeing. But “the priority” is wildlife and flora, rather than recreation. When listing the range of factors used to determine the quality of GI the recommendation is that the “potential for recreation and movement should also be considered.” Recreation shouldn’t be lumped in with green infrastructure. The list of “tools and metrics” to inform assessments of existing GI includes the British Standards for Trees, but for recreation there is a recommendation that “a mixture of play features for young people will enhance wellbeing – these spaces do not have to be overly designed or dominated by fixed equipment, but could also be comprised of wild areas and facilities that encourage engagement with nature and free-play.”	be the basis for monitoring the effectiveness of the policies.
G2	Strengthening tree policy	Welcome the mention of trees in point d). Suggest strengthening the policy with additional reference to the Local Nature Recovery Strategy.	Comment noted.

G2	Disagree with preferred option	Because space is at a premium in Oxford, the draft plan proposes that GI should be able to “perform multiple roles that support the sustainability of a development and its occupants.” This makes sense, but it does not make sense for multifunctionality to be the driving force. The 2022	Multifunctionality does not preclude a space from having a primary function. It allows the plan to recognise and cater for spaces that have additional functions

Draft policy	Topic	Summary of comments	Response

		GI study picked out Bertie Park as a small, multifunctional park, but its primary function is recreation. The draft says “Where new open space is provided, the type of provision should be tailored to address existing needs or deficiencies in access locally.” For larger applications with public open space provision, the suggestion is that engagement with the local community will help inform the type of space needed. For smaller applications it is unclear. But most consultation carried out by OCC is a waste of money. Many feel strongly about local issues, but few want to fill in forms either online or on paper. Many believe that it will make no difference. The draft policy states “In situations where the proposal relates to replacement provision that is mitigating losses elsewhere, this will need to be demonstrated to be equally or more accessible for people of all ages and abilities by walking, cycling and public transport to local users of the existing site where relevant.” This would mean that councils would never be able to restrict access on sites where joy riding has been a problem, or access to bicycles where footpaths are not suitable for dual use, or include features to	such as biodiversity value, flood storage etc so that adequate policy protections can be applied where relevant. The planning application process includes a statutory consultation period where members of the public can make representations on a scheme. Developers are encouraged to engage with planning officers at the earliest possible stage so that any concerns are identified at the earliest opportunity, and engagement with the local community is also good practice particularly for major schemes. The format of <i>scheme specific</i> early stage consultations are decided by the developer without the involvement of planning, even with council housing company

		prevent escape of livestock. It would therefore be helpful to	schemes. Participating in consultations

Draft policy	Topic	Summary of comments	Response
		require that replacement sites do not pose any of these challenges to provision of access.	is the best way to have input on the content of a scheme, particularly at an early stage. Accessibility in this context only means that a space can be easily reached by local residents without having to use a private car, and that it can be used by people of all ages whether or not they have a disability. It has nothing to do with facilitating criminal activity such as joyriding, allowing bicycles on footpaths, allowing livestock to roam free or removing restrictions that promote public safety.

G1/ G2/ G3		Local Plan 2040 para.8.66 (Reg. 19 plan) set out that there was a limited presence of GI features at ARC Oxford. This meant that it was likely to score below the minimum thresholds for green surface cover (Policy G3 – UGF (LP2040)). <i>“As such, proposals will need to ensure that an appropriate proportion of green features are incorporated into the design of development to meet the minimum targets set out in the policy, demonstrated through</i>	The thresholds for UGF in the plan are markedly lower than the recommended minimum contained in Natural England's GI Framework which informed this policy, in recognition of the constrained nature of development sites in Oxford. Thresholds for non-
Draft policy	Topic	Summary of comments	Response
		<i>submission of the Urban Greening Factor assessment.”</i> The above extract is clear recognition that the Council considers its own draft policies involving a combination of Draft Policy G1 and G3 is not deliverable at ARC Oxford. ARC consider this must be rectified by removing these sites from consideration as green spaces. The policy should recognise the potential for strategic sites like ARC Oxford to deliver GI holistically across multiple plots, with flexibility in how and where UGF targets are achieved.	residential schemes are lower still than that for residential led proposals. The intention behind the policy is to localise as much as possible the benefits that arise from the presence of natural features in development, which will difficult to achieve if offsetting is allowed.

Statutory Consultee Responses – Draft Policy G2

Sport England

Draft Policy	Summary	Response	Outcome
G2	Sport England recommends that the Council completes the playing pitch strategy and then seeks to implement it without delay. The existing PPS would provide a good starting point for the City to look at current needs and start to allocate sites to meet the need for new sports facilities. An assessment for play should	The first draft of the quantitative analysis needed to support the Plan is expected to be completed by the Regulation 19 consultation stage.	No further changes proposed.
Draft Policy	Summary	Response	Outcome

2195

	also be considered. Paragraph 103 of the NPPF states that; 'planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.' Simply providing hectares of green space is insufficient and ignores all the many types of open space that should be provided. The Council should also update its strategy for built sports provision.		

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome
Policy G2 Enhancement and provision of new GI and BI	Landscape and Nature Recovery – Biodiversity When providing new public open space as a replacement for losses elsewhere (page 72), it may be helpful to refer to the requirement for biodiversity to be considered and a net gain to be delivered.	Policy G4 relates to how Oxford will deliver mandatory BNG.	No Action Required

Draft Policy	Summary	Response	Outcome
	The maintenance and management arrangements (page 73) also link to biodiversity net gain. It may be useful to clarify that the management period of 5 years would be a minimum with longer encouraged and if BNG is being delivered a minimum of 30 years would be required. Landscape and Nature Recovery – Landscape Policy makes reference to provision of GI as a “fundamental component” in the design of new development. What is meant by a ‘fundamental component’ and how will this be assessed? This section would benefit from more detail. Should this policy include a link to the design code in Appendix 1?	BNG is discussed in full in Policy G4. Fundamental component – it will be for the decision-maker to determine what makes up a fundamental component when coming to their decision on planning applications. Assessment: The policy sets out that features should be highlighted clearly within the Design and Access Statement (where required) and/ or on landscape/ elevation plans...	No Action Required No Action Required No Action Required No Action Required

	Urban settings can be challenging environments for new planting and the right species choice and ongoing management are very important. The principle of the		

Draft Policy	Summary	Response	Outcome
	right tree in the right place should be applied and reflected in the policy. Larger growing trees that are suitable for the local conditions should be chosen where space permits as these have the potential to offer greater environmental and visual benefits than small trees in the long-term. The Local Plan does not appear to set a target for tree canopy cover. Consideration should be given to whether this should be included in this policy or one of the other green infrastructure policies. Public Health	The principle of the right tree in the right place is already included with the Council's Urban Forest Strategy. Noted. We can consider the inclusion of a canopy cover target within the plan.	No Action Required Oxford City Action: Consider further whether to include a canopy cover target in the plan No Action Required

Draft Policy	Summary	Response	Outcome

	Point e) should go further and implore the developer to consider how GI can be used to provide shade in relation to key urban realm features such as benches, gathering spaces and residential frontages. Point i) refers to community growing space but as per our previous consultation comments, this should also have its own standalone policy. Environment team – Countryside Access Further to our comment on Policy G1, there is also a need to provide for new public rights of way, and that should be referred to in Policy G2. Innovation Hub	This is already covered in the context of “urban cooling”, which is specifically mentioned in the policy We do not consider that community food growing warrants it own policy as it is already covered elsewhere in the plan (e.g., Green and Biodiverse city – objective 4; Policy HD13 – outdoor amenity space, Appendix 1: Design Checklist, section N2 and other metrics including UGF). Any new routes should be identified through the IDP	No Action Required No Action Required No Action Required

Draft Policy	Summary	Response	Outcome
	Innovative green infrastructure such as moss/green walls or shelters, green roofs etc should also be considered within this policy. Smart green roofs can provide an approach for climate change adaptation by collecting flood water and providing a cooling function in heatwaves. Urban Design (Placemaking) Paragraph 4.7 should include a reference to green and blue infrastructure being used to form place identity, in addition to health, wellbeing and environmental benefits. In relation to higher density areas/taller buildings, vertical green should be considered. Could more be said on this as this is a significant issue particularly in the city centre? (e.g., in paragraph 4.8) 'Larger developments will be expected to include on-site public open space such as small parks...' Play should not just be confined to a playground, other play elements	Noted – Green roofs considered within Policy G8: SuDS. We will consider whether this is the appropriate place to discuss these issues. Green roofs/ walls are considered under Policy G8: SuDs.	Oxford City Action: Consider whether G2 is right place for these issues. No Action Required No Action Required No Action Required No Action Required

	(play on the way, play affordances) can easily be		
Draft Policy	Summary	Response	Outcome

	incorporated into developments where appropriate, e.g. Giant boulders instead of bollards, or undulating grass/hills rather than perfectly flat, building ledges or boundary treatments to offer seating or an affordance to balance, climb, jump from etc. (Paragraph 4.8) Greening should be structurally diverse (by type, e.g. low-level planting to bushes to trees), not just by species. Developers should also be expected to assess existing green infrastructure and identify where and how their site can strengthen the green network by creating new 'patches' or connecting with existing corridors. Where there are watercourses, greening should still be considered in relation to improving water quality. Greening can be used as natural filter for surface runoff which may otherwise be polluting the blue network. Could be point 'k' in policy.	Agreed however, ensuring the delivery of small parks to support new developments is also important. The other measures would benefit from inclusion within a public realm/ landscaping strategies for the city rather than in a policy providing new public open space. Noted. Plan includes a bespoke water quality policy – R5 and the “natural” filtering of water occurs through SuDS (Policy R8)	

Historic England

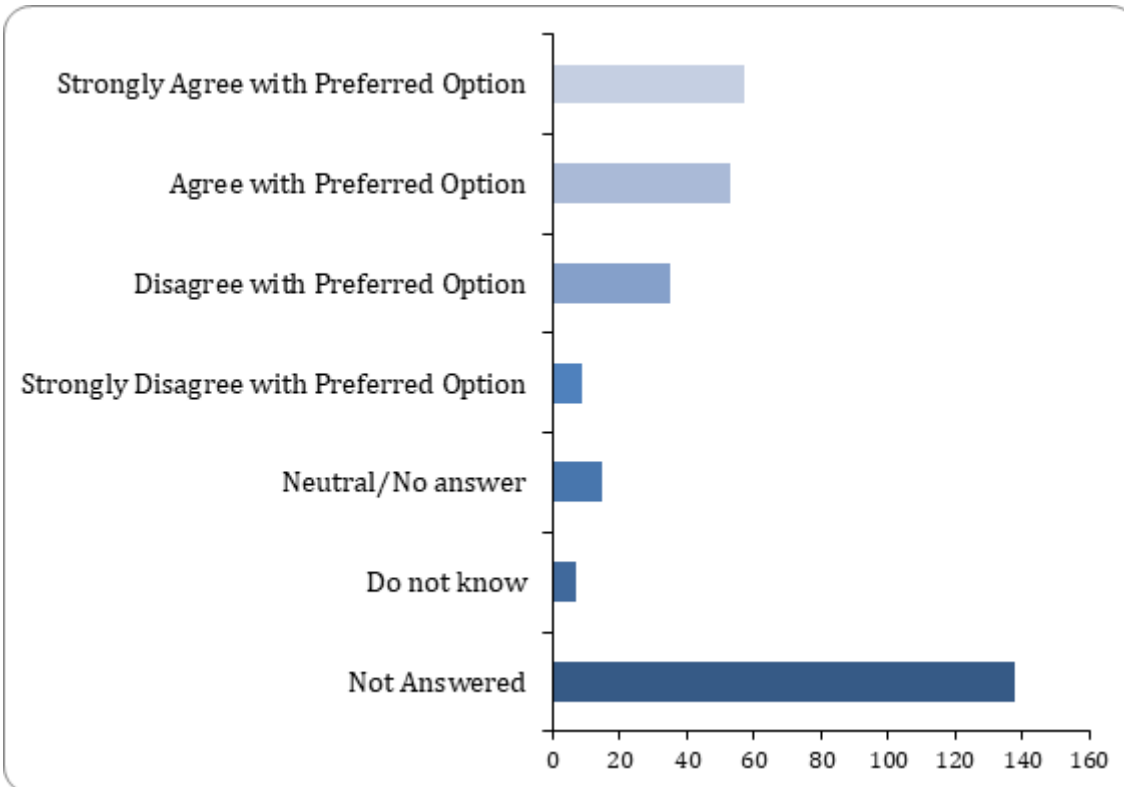
Draft Policy	Summary	Response	Outcome
G2	Encourage the Council to refer to the scope for new green and blue features to enhance the significance of heritage assets in Oxford and enable that significance to be better appreciated. Reference to setting of assets is also merited. This would help explain criterion G.	The policy sets out a number of functions that could be targeted including enhancing the historic environment. To expand on all of these points in supporting text could make it very long, particularly as the key message is that multifunctionality should inform the design process. We will consider whether additional detail is needed in the accompanying Technical Advice Note.	No further action at this time.

All Public Responses – Draft Policy G3

Urban Greening Factor

Please tell us what you think about Policy Options Set 005c (draft policy G3): Urban Greening Factor.

There were 176 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	57	18.15%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	35	11.15%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	15	4.78%
Do not know	7	2.23%
Not Answered	138	43.95%

Draft policy	Topic	Summary of comments	Response
G3	BBOWT support alternative option 1	Whilst we support the preferred option we consider that to be most effective it needs to apply to the vast majority of developments. Our preference is for "Alternative Option 1: The scale of application of the UGF tool could be mandatory across all developments in the city."	The support for use of the UGF tool is welcomed. We consider the threshold for requirement proportionate.

G3	Object – Doesn't align with NPPF	It is requested that this policy be deleted. The NPPF states that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 188) and local planning authorities should take opportunities to improve biodiversity when assessing individual applications (paragraph 193). The incorporation of draft policy G3 will result in an unnecessary additional policy hurdle when the protection of green spaces and achieving net gains in biodiversity can be already achieved under draft Policies G1, G2, G4 and G5. It is recognised that the provision of new green spaces as part of development proposals is constrained. However, this requirement puts significant pressure on applicants which have limited site areas and which have certain functions that also need to be achieved in those spaces. The use of the policy to prevent the loss of space would essentially sterilise the potential for development which, if allowed, could achieve wider benefits such as the release of general housing back into the market. For example, at Oxford North, where the site was	The UGF is a tool intended to ensure new developments incorporate a good level of greening, which has a variety of positive impacts. The measures proposed to achieve this requirement may overlap with requirements for protection and BNG, but for example even where BNG is off site there should still be green infrastructure on the site, and this may be part of protecting and enhancing existing but in some cases there will be no or little existing and there are benefits to it being introduced. The measures needed by the policy have been broadly tested on the site allocations and are achievable. A whole range of creative options are available that have limited impacts on the

Draft policy	Topic	Summary of comments	Response

		greenfield land it would be impossible to recover this position through other greening features. As such the criteria to have “no reduction in baseline score” is unlikely to be achievable and the criteria should be deleted. It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a ‘simpler’ output. However, it is questioned why this additional layer of calculation is required as where it has been introduced elsewhere (mainly in London) this tends to have been prior to the introduction of the minimum biodiversity net gain requirements in Local Plans.	development space, and developments without green features will not create good or attractive places that people want to work or live in. A tweak has been made to the policy regarding the baseline score on green sites, to make it more achievable.
G3	Support – Suggest amendment	It is welcomed that the updated draft policy wording provides further information on the expectation with regard to the green coverage in new developments. The draft policy states that major development proposals should demonstrate that there would be no reduction in baseline score and achieve a minimum score of 0.3 for residential or predominantly residential schemes. We request that the policy wording is adjusted to make clear that this is a target rather than minimum.	The scores contained in the policy are intended to be a minimum. The required score has been set at the level it has, to encourage as much as possible the achievability of application for constrained sites with limited developable areas. It is markedly lower than the recommended minimum in the Natural England Green Infrastructure Framework.

G3	Object – Not justified	It is recognised that the provision of new green spaces as part of development proposals is constrained however, this requirement puts significant pressure on applicants who have limited	The required score has been set at the level it has, to encourage as much as possible the achievability of application for

Draft policy	Topic	Summary of comments	Response

		site areas and who have certain functions that also need to be achieved in those spaces. Mansfield College may seek to expand the provision of student accommodation on the campus and this may involve the loss of some of the current green space to enable this to happen. The use of the policy to prevent the loss of space would essentially sterilise the potential for development at the site which, if allowed, could achieve wider benefits such as the release of general housing back into the market. It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a 'simpler' output. It is questioned why this additional layer of calculations is required as where it has been introduced elsewhere this tends to have been prior to the introduction of the minimum net gain requirements of Local Plans. It is considered that this policy is not fully justified nor does it allow any scope for flexibility where circumstances indicate that it would sterilise development.	constrained sites with limited developable areas. It is markedly lower than the recommended minimum in the Natural England Green Infrastructure Framework. The UGF methodology is not intended as a replacement for detailed ecological analysis and associated metrics such as DEFRA Biodiversity metric, even though they have complementary aims. Metrics such as BNG are linked to a wider ecological context, which can allow for offsetting and off site contributions in the appropriate circumstances, whereas the intention for UGF is to localise the benefits that come from the onsite establishment of natural features including climate adaptation, mental and physical health and wellbeing and biodiversity.

G3	Doubt about viability/achievability	Concern about investment needed for ecological expertise which the Council probably doesn't have	The tool is an online system/software which doesn't

Draft policy	Topic	Summary of comments	Response
		or big enough team to do this. It would only become plausible with the development of a fundable budget to cover it.	require advanced technical knowledge. UGF can be completed through tools such as excel and google earth so not overly expensive
G3	Object – concern about misuse and undermining BNG	UGF is a blunt tool that is open to misuse and can in certain circumstances conflict with others such as BNG. I would want it to be subordinate to BNG and/or open space standards	The policy states UGF is to be used alongside BNG
G3	Support – thinks could go further	Suggested deeper more comprehensive ecological surveys before larger developments Greening should be along boundaries to mitigate climate change	
G3	No policy, leave to national policy	The extra level of complexity for a constrained city that needs to prioritise brownfield, leave to national policy of 10%	The biodiversity net gain requirement does align with national policy. The UGF is a separate requirement, which is particularly important in a constrained city, where biodiversity net gain may be off site, to ensure sites incorporate green

			infrastructure with its many benefits.
G3	Suggested wording	We welcome the use of the “Urban Greening Factor (UGF) with particular attention on the naturalness of surface cover with particular emphasis on natural coverage.” However, the target baseline score seems low in ambition.	The target scores have been tested and represent an achievable and good level of greening.
Draft policy	Topic	Summary of comments	Response

		• 0.3 for residential or predominantly residential schemes • 0.2 for predominantly non-residential schemes Is too low as a baseline score. We would encourage others to read Natural England report: Urban Greening Factor for England – Development and Technical Analysis - NERR132 This report highlights that the average target is 0.4 (40%)= residential 0.5 =greenbelt 0.3 = non-residential. We would recommend these levels to be the minimums for Oxford. The aim to get a local average of higher than these, such as Helsinki with 0.8 We would also like to see a sliding scale with lower socio-economic areas specifically highlighted as a higher target, such as a maximum minimum in the most deprived areas = 0.7.	

Statutory Consultee Responses – Draft Policy G3

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome

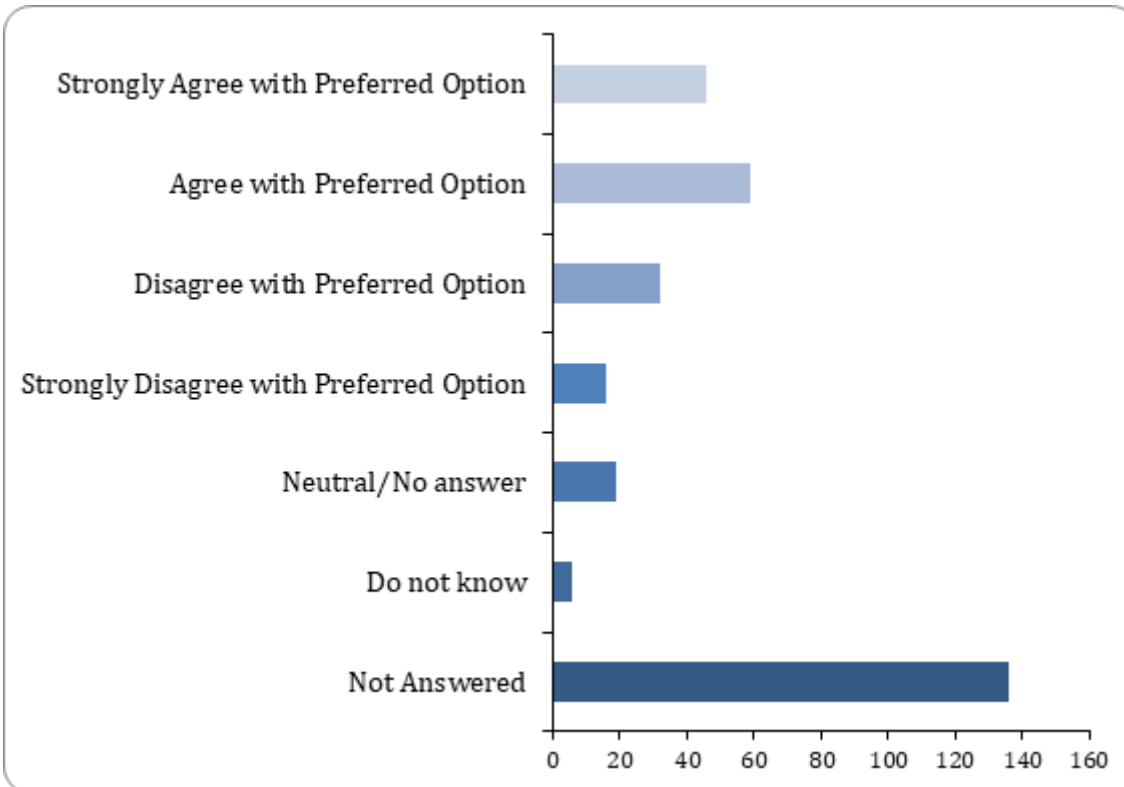
Policy G3	Landscape and Nature Recovery – Biodiversity / Landscape		
Provision of new green and blue features – UGF	UGF is not mandatory for all developments. However, we wonder whether greatest green infrastructure benefits could be achieved if it was mandatory for all developments, especially if located in areas of existing GI deficiency unless particular circumstances and reasoning are demonstrated. Major development should be defined. The application of UGF for non-major developments should be considered here as a way for smaller developments to demonstrate a measurable net gain in biodiversity to satisfy NPPF and local planning policy when they are exempt from the mandatory BNG requirement.	It is a requirement for larger developments and encouraged on smaller ones. Larger (major) developments can offer the most scope for a wide variety of improvements. Major development is defined in the NPPF (10 or more homes or 1,000 sqm non-residential floorspace). Policy already encourages smaller (minors/ householders) to apply the UGF.	No Action Required No Action Required No Action Required

All public Responses – Draft policy G4

BNG

Please tell us what you think about Policy Options Set 005d (draft policy G4): Delivering Mandatory Net Gains in Biodiversity.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	59	18.79%
Disagree with Preferred Option	32	10.19%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	19	6.05%
Do not know	6	1.91%
Not Answered	136	43.31%

Draft policy	Topic	Summary of comments	Response
G4	Support	Agree with the preferred option of draft policy G4 to align with the statutory net gain requirements under the Environment Act (2021) to deliver 10% net gain and to follow the hierarchy of prioritising delivery of net gains onsite and where this is not feasible, delivery off site. If landowners/developers are able to achieve more, that is still possible and strongly encouraged under such as policy approach. there is no evidence for a policy which requires biodiversity net gains greater than 10%.	The support is welcomed.
G4	Potential legislation changes for small sites	The City Council will be aware of proposals under consultation by the Government to remove the 10% requirement for small and medium sized sites. Draft Policy G4 will need to evolve to reflect any changes to legislation in this regard	Comment noted.
G4	Unnecessary	This draft policy repeats national requirements and is therefore unnecessary and should be deleted.	The requirement is set out nationally, but the policy adds additional local context about how it is implemented.

G4	BBOWT	Whilst we welcome the hierarchy set out and hence we have ticked “Agree with preferred option”, we consider that the alternative option of seeking greater than 10% net gain should be taken forward, in addition to the hierarchy as set out in the preferred option. We recommend 20% net gain is sought. This is supported by the work done by the Oxfordshire LNP https://www.olnp.org.uk/lnp-projects/advocating-	

Draft policy	Topic	Summary of comments	Response

		for-20-biodiversity-net-gain-bng . In addition all the other District level authorities in Oxfordshire are taking forward Local Plans asking for above 10% in one way or another, for example a standard 20%, or 20% on major development. We consider that there is equally justification for 20% to be sought within Oxford City as anywhere else in Oxfordshire and that 20% should be sought. BBOWT also recommends that content is included within a net gain in biodiversity policy to ensure that all habitat retained, enhanced or created (whether it is on-site or off-site) for the purpose of achieving both no net loss, and net gain, is retained forever (e.g. in perpetuity - for at least 125 years). Otherwise, the no net loss or net gain merely becomes a temporary net gain, and ultimately over time development will result in a large net loss to biodiversity.	
G4	Mechanism for offsite payment	Should establish a mechanism and or policy for such off-site delivery of BNG to be achieved by financial transfers to local environmental charities e.g. BBOWT and Earth Trust.	This mechanism is not in place and can't be managed by Planning.
G4	Monitoring	Onsite and offsite BNG should be monitored with a clear maintenance plan for onsite BNG.	
G4	Offsite land which is recipient of BNG should be exempt from development	Where BNG is delivered offsite according to the hierarchy, the recipient green space should henceforth NOT be considered for development	

		for a minimum of 30 years in line with the BNG requirement.	
Draft policy	Topic	Summary of comments	Response
G4	There should be no hierarchy to work through- straight to offsite is fine	Every extra rung on the ladder before buying statutory credits adds transaction costs, legal complexity and delay- especially in a land-scarce city where suitable receptor sites are rare. This squeezes viability. The DEFRA metric and credit market guarantee ecological uplift already, so this approach has no measurable gains.	There are opportunities within Oxford, and it is considered important that the policy ensure these opportunities are taken where possible.
G4	Should be onsite	Proposals should be modified to ensure net gain is onsite. It can be very creative, such as a roof garden. If it can't be achieved, the site is unsustainable.	The requirement is simply not feasible to provide onsite on the majority of the constrained sites in Oxford, however creative the solutions are.
G4	Exceed 10%	Cambridge and other development-stressed LPAs have done this, why not Oxford? 20% better covers the large margin of error in BNG.	It is now required that exceeding the 10% requirement is robustly justified, with reasoning that we think it would be difficult to apply in Oxford.
G4	Comment on uses it applies to	Comment that it should not apply to housing, to encourage housing. Comment that it may be difficult on industrial sites.	The basic requirement, including

			what it applies to, is set nationally.
G4 and G5	Objection	Must include provision for where the habitat is NOT swappable, it is not permitted.	Comment noted.

Statutory Consultee Responses – Draft Policy G4

Sports England

Draft Policy	Summary	Response	Outcome
G4	For information, Sport England has recently published guidance on biodiversity net gain to help show how biodiversity measures can be incorporated into playing fields without compromising their intended sporting use or long-term protection. https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/our-planning-role-guidance-and-tools/BNGand-support/facilities-and-planning/planning-sport/our-planning-role-guidance-and-tools/BNG#:~:text=About%20the%20guidance,10%25%20net%20increase%20in%20biodiversity.	Comments noted.	No further changes proposed.

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome

Policy G4	Landscape and Nature Recovery – Biodiversity		
Delivering mandatory BNG	A BNG of 20% is encouraged in line with other emerging local plans in Oxfordshire. It is recommended that prioritisation should be given to delivering ecological habitat enhancement and creation within ecological networks at county level over delivering habitat enhancement and creation outside of ecological networks within Oxford city outside of the LNRS.	Oxford is a small, constrained city with limited opportunities to deliver the mandatory 10% net gains. Increasing the requirement to 20% would not result in more biodiversity net gain in the city but rather an increase in delivery outside of Oxford. District Plans already propose 20% BNG across Oxfordshire. It is important that BNG impacts are received locally. Noted.	No Action Required No Action Required

Draft Policy	Summary of comment	Response	Outcome

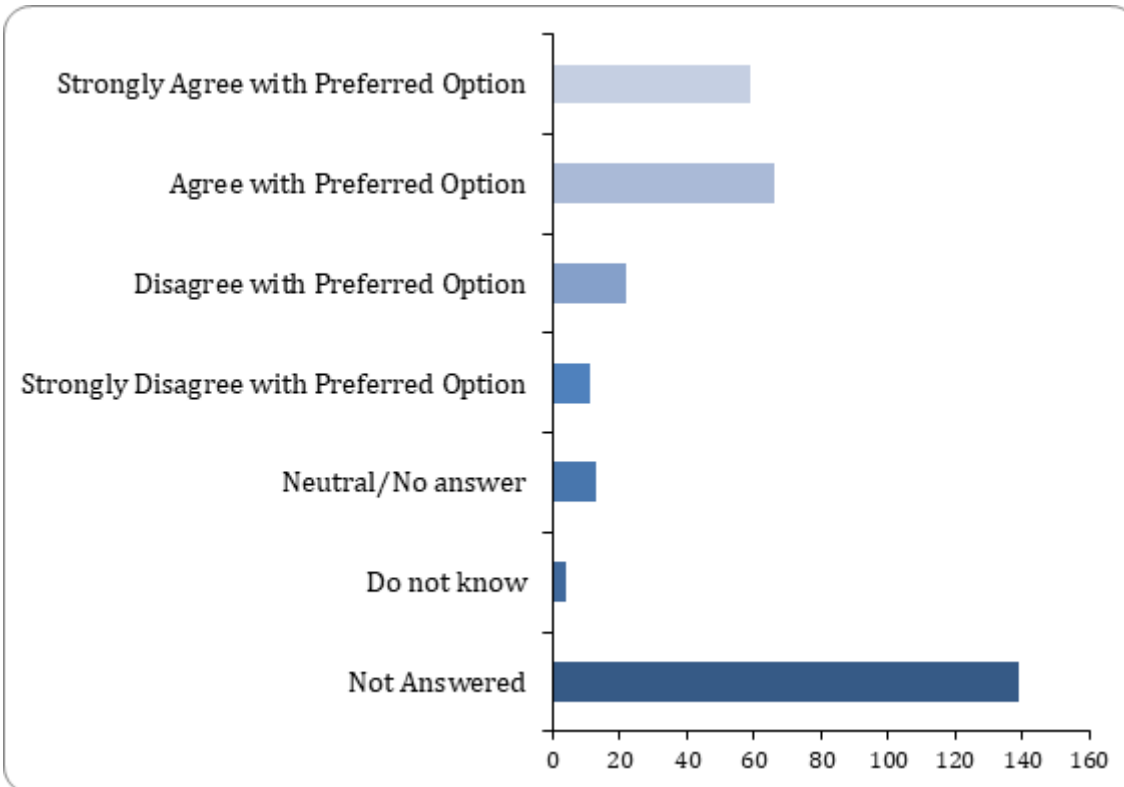
	Encouragement should also be given to using offsite offset areas outside of ecological networks within Oxfordshire as a step before considering sites further afield. It is considered that this approach would be more aligned to the Local Nature Recovery Strategy (LNRS) once published. The encouragement of delivering more technically offsite difficult habitats that may deliver lower BNG units (due to the application of the difficulty multiplier within the metric) where feasible is welcomed and this approach should also be considered for onsite habitats where feasible. Public Health We concur with the Landscape and Nature Recovery Team that we'd want to see a BNG minimum net gain of 20%.	See response above.	No Action Required No Action Required

All Public Responses – Draft Policy G5

Onsite biodiversity

Please tell us what you think about Policy Options Set 005e (draft policy G5): Protecting and enhancing onsite biodiversity

There were 175 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%
Agree with Preferred Option	66	21.02%
Disagree with Preferred Option	22	7.01%
Strongly Disagree with Preferred Option	11	3.50%
Neutral/No answer	13	4.14%
Do not know	4	1.27%
Not Answered	139	44.27%

Draft policy	Topic	Summary of comments	Response
G5	Support	It is important to take all opportunities for enhancement (some mentioning there should be more mention of trees).	The support is welcomed.
G5	Superfluous, do not have policy	It is considered superfluous to impose additional prescriptive requirements, in addition to mandatory Biodiversity Net Gain, on all sites. It may be more appropriate to impose such prescriptive measures only on sites where BNG is provided offsite, to ensure a degree of support for wildlife is still provided on-site in these circumstances. The requirement duplicates other requirements and adds consultant fees and squeezes value.	Whilst there are overlaps between several policies, they do also all have a slightly different purpose and function. It will generally be the case that features designed-in in response to one policy will also help meet the requirements of another policy.
G5	Support alternative option	Prefer option 1, 2 or 3	Noted
G5	Local Nature Recovery Strategy	The Local Nature Recovery Strategy (LNRS) has yet to be published, and this should be acknowledged within the Plan. A further stage of consultation should be undertaken to include LNRS guidance. Failing this, it should be stated that this Plan will adhere to guidance from the LNRS when available. All green spaces should be protected and there should not be a hierarchy.	The LNRS is in the process of being finalised and will be adhered to.

G5	Not enough or strong enough	What is more important is protecting existing. If wildlife and habitats are destroyed they can't be replaced. Bird and bat boxes are not biodiversity. Ecologists should be required, not just encouraged.	Other policies do also protect existing green infrastructure.

Draft policy	Topic	Summary of comments	Response
G5	More flexibility needed.	Alternative option 1 is preferable. There should be flexibility for design solutions that recognise sitespecific conditions and challenges in greening certain constrained sites (e.g. brownfield industrial). If it must be tick box, then there should be space for designers to incorporate their own natureinspired ideas. It must be customisable to fit what's appropriate to the surroundings.	The policy does have flexibility as there is no prescriptive use of any particular measure, and measures appropriate to the site can be selected.
G5	BBOWT	BBOWT strongly welcome the inclusion of this policy, and the preferred option.	Support welcomed.
G5	Viability	It is unclear how these requirements are factored into viability testing.	Whole plan viability testing has taken place, which includes all policies with a potential 'cost' implication.

G5	Suggested amendment	CPRE recommend that on-site biodiversity enhancements be made mandatory for all developments, regardless of whether BNG has been delivered on-site or not. We also propose that the wording in the following sentence be strengthened by replacing "should seek to" with "must": “All extensions and new-build development <u>must</u> incorporate ecological enhancements into landscaping or building facades/roof spaces, tailored to the priority habitats and protected	This is the intention of the Policy G5. Comment is noted.
Draft policy	Topic	Summary of comments	Response
		species present within the site and surrounding area.” Regarding the sentence: “Seeking advice from a suitably qualified ecologist on the ecological enhancements selected is encouraged,” we suggest clarifying that such advice is required only for minor and major developments. Requiring this for household extensions could create unnecessary barriers for homeowners.	

G5	These aspects should not contribute to BNG or mitigation	• Tree planting should not be judged as contributing towards BNG especially young trees which easily die and decay without maintenance, releasing carbon • Bird and bat boxes – maintenance issues and are unlikely to be used • Green roofs – maintenance issues	Regulations around BNG are separate.
G5	Should not apply to extensions	Do not disagree with the principle of Draft Policy G5. However, greater clarification should be provided that the provisions relate to new builds and not conversions of buildings.	This is considered to be clear.

Statutory Consultee Responses – Draft Policy G5

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

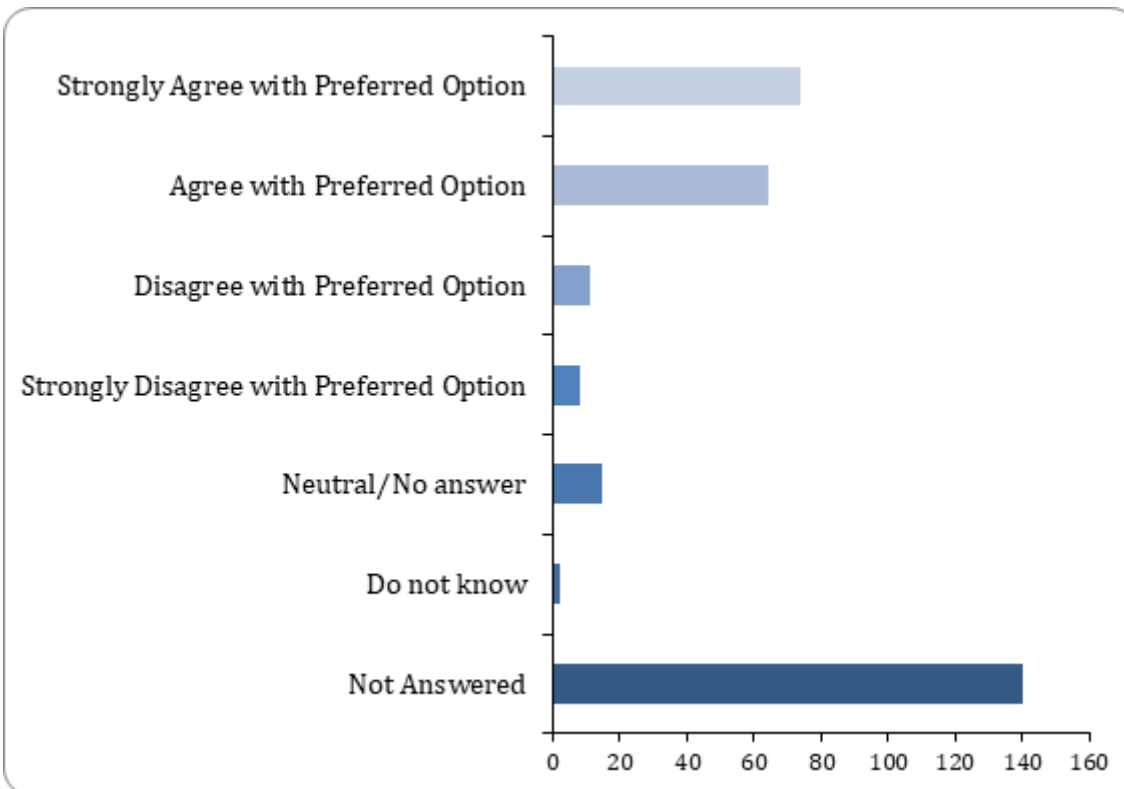
Policy G5 Enhancing onsite biodiversity in Oxford	Landscape and Nature Recovery – Biodiversity Could strengthen requirement to include an element of native planting. Suggested amendment: <i>‘Planting should be designed to maximise the biodiversity value as far as possible while still delivering other functions where needed’.</i> It would be useful to define what species are considered invasive in the context of the policy and whether schedule 9 of the Wildlife and Countryside Act 1981 is referred to.	We can consider whether to include this amendment going forward. We can consider the inclusion of a reference here.	Oxford City Action: Consider proposed wording going forward. Oxford City Action: Consider proposed wording going forward.

All Public Responses – Draft Policy G6

Ecological network

Please tell us what you think about the policy options set 005f (draft policy G6): Protecting Oxford's ecological network

There were 174 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	74	23.57%
Agree with Preferred Option	64	20.38%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	15	4.78%
Do not know	2	0.64%
Not Answered	140	44.59%

Draft Policy	Summary	Response	Outcome
G6	General support for aspects of policy	Welcome the inclusion of specific policy with respect to the hierarchy of sites such as SACs, SSSIs, LWSs, OCWSs, pLWSs, pOCWSs. Also welcome the inclusion of specific policy wording relating to particularly vulnerable sites such as the Lye Valley SSSI and Oxford Meadows SAC with requirements re hydrology, although feel this should go further.	The support is welcomed.

G6	Irreplaceable habitats	Strongly consider additional wording needed in relation to irreplaceable habitat. The preferred option text states: "Reiterate national guidance for how to deal with irreplaceable habitats." But we could not find text that does that, or that addresses the following text in the NPPF: "193.....c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons ⁷⁰ and a suitable compensation strategy exists;" We consider this text	The intention was to set this out in supporting text to the policy (which was not a part of the consultation), as it is not necessary to repeat national policy (which already sets strong protection for irreplaceable habitats). Whilst we would contend that it is not necessary for the policy to repeat national policy, we have however incorporated an amendment into the policy wording in response to this comment.

Draft Policy	Summary	Response	Outcome
		should be included as policy text in the Policy in order for the policy to be sound. We suggest that this is best placed directly after the policy in relation to SACs. Similar text has been included in the draft Local Plans of several adjoining authorities.	

G6	Priority habitats and species	Whilst we welcome the inclusion of text relating to priority habitats and species in the draft G6 policy text we do not consider it to be worded sufficiently strongly to be effective in delivering the intention of the following NPPF text: “192....b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.” Alternative wording is needed and recommend the approach taken in the draft SODC/VoWHDC Local	A significant amount of priority habitat is located on land in Oxford that is protected strongly through the Ecological site designations and the Core Green Infrastructure network protections (biodiversity value was a key element that informed the Core GI network designation). Remaining areas of priority habitat are then protected through the wording highlighted in the comment. This is considered to be a proportionate and pragmatic approach which is in keeping with the NPPF.

Draft Policy	Summary	Response	Outcome
		Plan or that in the draft Cherwell DC Local Plan.	

G6	Oxford City Wildlife Corridors	Oxford City wildlife corridors have played a key role in conserving wildlife within the City and their importance and role in planning should continue and be included in planning policy. We consider it vital that this latest Local Plan continues the emphasis on the importance of protecting the Oxford City wildlife corridor network, as in Policy of the Oxford Core Strategy to 2026 which stated in Policy CS12, with our underlining: “Local sites: No development should have a significant adverse effect upon a site that is designated as having local importance for nature conservation or as a wildlife corridor, save in exceptional circumstances where the importance of the development outweighs the harm, and where it is possible to compensate for the damage caused by providing adequate replacement habitat.”	Whilst G6 protects the designated sites, policy G1’s green infrastructure network (which also includes G6’s sites) protects a wider range of green spaces in its core designation layer. This include sites that provide a wider biodiversity function including acting as corridors, though they might not be designated. The Local Plan also emphasises the importance of protecting and enhancing linkages between green spaces through its green infrastructure policies (G1 and G2).

Draft Policy	Summary	Response	Outcome

G6	Protection of Lye Valley (and other calcareous locations) not enough due to impacts on ground/surface water flows	Comments flagging the vulnerabilities of Lye Valley (and other calcareous locations) from increasing development leading to reduced groundwater, and increased scouring from surface water via urban drainage. The current wording of G6 in relation to groundwater/surface water flows is “a very considerable weakening from the current Local Plan 2036” (Policies RE3/RE4). For instance, Lye Valley and similar areas are only mentioned in the supporting text, not the policy itself.	The policy sets out a framework of protection for all the SSSIs from the impacts of inappropriate development (on top of the requirements in national policy). Each SSSI is susceptible to different types of impact/adverse effect, and the key ones are set out within the policy. The policy then specifically flags that areas like Lye Valley are susceptible to impacts on groundwater/surface water flows and folds in the requirements set out previously in separate policies in Local Plan 2036. As such, we disagree that this has been weakened.

G6	Policy specific to protection of lowland fen habitats the Lye Valley	Whilst welcoming reference to protecting the Lye Valley in G6 – stronger requirements within a separate policy are needed. Also to ensure protection of alkaline spring-fed lowland fens found within and around the city. These lowland fen habitats are UK priority habitats, and also are irreplaceable habitats, so that the NPPF	National policy already sets strong protection for irreplaceable habitats which does not need to be copied in the Local Plan. Policy G6 sets a framework of protection for habitats of various types from adverse effects of development, and this would include lowland fen wherever it is found and other habitat that forms part of designated sites like the Lye Valley. However, as per earlier response, we are happy to add

Draft Policy	Summary	Response	Outcome

		policy on irreplaceable habitats applies to them. This habitat is exceptionally rare and cannot be recreated elsewhere as it is dependent on a combination of geology and geography with a calcareous spring-fed water source of the right quality and quantity. This occurs at only a few locations in the UK. The fens are highly vulnerable to changes in water quality and quantity which may arise from development within their catchment. They are also vulnerable to trampling damage, increases in nutrients (from dog mess and air pollution), and changes in the grazing regime (which may be inevitable due to increased recreational pressures) that may be needed at some sites to maintain the plant species that make a fen special.	reference to the national requirements for development impacting irreplaceable habitats in the policy.
G6	Formal identification of calcareous emergence areas	Request formal identification of calcareous emergence areas including,	The role of the policies map, where this would need to happen, is not in identifying every type of habitat and location in the city. Other mapping resources are available for these purposes. There

Draft Policy	Summary	Response	Outcome
		but not limited to, Headington Hill and Dunstan Park, Ruskin College.	are a wide range of habitat and geological considerations which might be of relevance, not just calcareous areas. To attempt to identify all these would not only over complicate the policies map, and there may be other areas which have yet to be identified (e.g. arising from future surveys).
G6	Net gain needs to be onsite	Net gain needs to be achieved on site, not hived off to some other area which may have had a perfectly workable environmental community before then, and which may be too far away for residents to benefit from it. Net gain elsewhere is unlikely to be able to offset impacts of development on certain species e.g. loss of buildings/trees of importance for bats.	The Environment Act sets out how net gain should be approached. Policy G4 seeks to further set out our local preferences for onsite in first instance. G6 seeks to ensure impacts on existing species are appropriately addressed (e.g. following the mitigation hierarchy).
G6	Additional requirements for protecting the Lye Valley from adverse effects.	Varoius comments including: Add a statement that says: "Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley	An additional statement (or a full policy) is not considered to be necessary. Policy G6 already sets out that development would not be permitted where it would have an adverse effect on any SSSI. The policy explains that an adverse effect could

			include various impacts including (but not limited to) hydrological

Draft Policy	Summary	Response	Outcome
		SSSI” to apply to all development, not just designated sites. Include a specific policy to address future issues which could impact the Lye Valley specifically, including risk of pollution from the sewer network as infrastructure ages, as well as new boreholes supporting heat networks of nearby buildings	impacts in relation to surface or groundwater. This requirement applies to all SSSIs including the Lye Valley and would be relevant to development anywhere within the impact risk zones that could lead to adverse effects on a SSSI like the Lye Valley. The supporting text of the policy will flag that there are particular hydrological impacts that the Lye Valley is sensitive to.

G6	No further development in groundwater catchment	Request an Article 4 Direction in both groundwater and surface water catchment areas of the Lye Valley to reduce cumulative impacts of redirection of water to urban drainage. SUDS are unacceptable as they will fail and require maintenance.	The process for implementing an article 4 direction is complex, and must be justified and proportionate. It is also a separate process to the preparation of the Local Plan. Nevertheless, with the Local Plan the Council has sought to include a range of policies for reducing surface water run-off and reducing its water quality impacts (e.g. Draft Policy G8 and R5) as well as generally increasing green surface cover on sites to mitigate impacts of urbanisation (Draft policy G3).

Draft Policy	Summary	Response	Outcome
G6	All development sites should need to assess potential indirect impacts on flora and fauna	"Any planning applications near the Boundary Brook or Lye Valley/SSSI/LNR/LWS etc) will also need to assess the potential for additional indirect impacts on the flora and fauna of those area." should be a statement that applies to all development, not just particular sites.	Policy G6 sets out protection for all these types of designations and applies to any development that could have adverse effects.

G6	Policy currently excludes natural habitats	“Proposals with a reasonable likelihood of adversely impacting semi-natural habitats” requires rewriting as it excludes natural habitats.	Whilst definitions vary, semi-natural habitat is typically defined as being any wild/natural habitat that has at some point been influenced by human activity, even if this was historic. This is generally the case (to varying degrees) across the majority of the city, which is why we typically use this term. However, for completeness, we are happy to amend the reference to natural or semi-natural habitats.
G6	Protection of nondesignated sites	The main priority of the Headington Neighbourhood Plan is “to conserve green space and increase public access and biodiversity”. Do not believe that council is protecting important green spaces and features and requiring biodiversity	G1 protects a network of green infrastructure - core and supporting spaces as well as green features elsewhere. Equally open spaces benefit from some protection through national policy. G6 adds protection for national or local designated sites where there is particular

Draft Policy	Summary	Response	Outcome

		enhancements and new green features on sites. The requirement for developers to protect non designated green spaces is too weak (i.e. it is easy for developers to justify loss by showing they have “considered the information from various sources where relevant”, or claiming “exceptional need”. All of Oxford’s remaining green spaces should be protected with a requirement to improve their quality, access, connectivity and number.	biodiversity importance. G6 also sets out how potential impacts on habitat or protected species (regardless of where they are located) should be addressed. We will try to ensure that this broader picture of protection is set out clearly in the supporting text of the Local Plan.
G6	Biodiversity – suggested supporting text for biodiversity or a similar policy	Rep contains detailed wording suggestions regarding Great Crested Newt District Licence Scheme and a glossary to be added to the biodiversity policy or a similar policy.	We've reviewed the proposed wording but the level of detail goes beyond the scope of the policy and would potentially be more helpful to reference in some way through the supporting Technical Advice Note we intend to prepare to support the policy.
G6	Policy requirements for local sites	Various comments relating to the wording: <i>Where proposals result in habitat loss within a LNR or LWS, they must retain and enhance the interest</i>	Policy G6 needs to be read in conjunction with the protection for the green infrastructure network (policy G1). Local wildlife sites are protected through policy G1 as ‘core’ spaces

Draft Policy	Summary	Response	Outcome
		<i>features for which the site was selected.'</i> Hard to see how this would provide any satisfactory outcomes, appears to mean that a developer can build on most of a nature reserve but retain or plant a couple of native trees to represent the site that had been lost. A few token bits of 'wildlife' cannot substitute for the loss of a whole location, its ecosystem and biodiversity. The protection of local sites and other green spaces must be increased, not just the legally designated sites (SSSI, SAC). The Policy should state categorically that they MUST not be either developed or harmed by any development. This is particularly important in Headington which has seen huge developments in recent years and which continues to be the location for new major developments eg the Warneford site.	which would prevent development on them. Policy G6 then sets out additional considerations which might apply, e.g. if development happens near by that could result in adverse effects on the functioning of these spaces.

Draft Policy	Summary	Response	Outcome
G6	Local authorities should be identifying and protecting existing habitats	Several comments say that local authorities should be identifying and protecting existing habitats, not leaving it to the applicant.	The Local Plan designates a network of habitats of national, county-wide and city importance. Separate policy G1 also protects a range of green spaces because of their identified importance to nature. Policy G6 simply requires that where applicants propose development, their approach is informed by a good understanding of potential ecological interest on their site and that they respond to this accordingly.
G6	Overall wording needs to be stronger	Many comments argue the wording needs to be strengthened so that policy “requires”, instead of “seeking to ensure”.	Comments noted – the requirements in the policy vary in strength depending on which elements of the ecological network they respond and their level of designation/sensitivity.
G6	Measuring value of ecological habitats	Further clarification is needed on how to measure the value of ecological habitats for the purpose of compensation.	The level of detail this would require is not something that can be easily captured within the policy or supporting text. The policy sets the framework for what is expected, but the approach to assessing ecological value on a site in order to meet these requirements will depend on the context of the site, the potential ecological features of interest and the type of application proposed.

Draft Policy	Summary	Response	Outcome
G6	No hierarchy – all nature must be protected and green corridors encouraged	Against a hierarchy of nature as it suggests some sites are expendable if not deemed important enough. Having isolated ‘special’ sites is ineffective as there is a need for joined up corridors and a critical mass of these.	National policy is clear that Local Plans should identify a hierarchy of international, national and locally designated sites. The Local Plan sets out various levels of protection for nature and green infrastructure beyond just the designated sites in the hierarchy.
G6	OCWS – Rock Edge	Rock Edge SSSI is showing increasing wildlife diversity of limestone flowers due to improved management and now worthy of OCWS designation.	Noted – the site will benefit from core protection in the green infrastructure network aswell as SSSI protections in national policy and policy G6.

G6	Require developers to engage with environmental charities	There should be a policy or mechanism which requires funded engagement with local environmental charities such as with the Earth Trust or Berks Bucks & Oxon Wildlife Trust. This should be enforced by the Council to protect Oxford's ecological network.	It would not be appropriate for the Local Plan policy to dictate specific groups that applicants should pay to engage with. The policy sets the framework for how existing ecology needs to be protected when proposing new development. How applicants meet the requirements will depend on context of the site and potential ecological features that may be present, as well as the type of development proposed. There is no one-size-fitsall approach. We would be happy to consider referencing local groups and expertise as part of the supporting Technical Advice Note that we
Draft Policy	Summary	Response	Outcome
			envisage preparing to support the policy in future.

G6	Defer to national policy with bespoke guidance for the handful of designated locations in Oxford	A few comments would prefer to remove local policies for protecting and enhancing on site biodiversity, instead relying on national standards and policies. Multiple comments say there should be bespoke guidance for the handful of locations that face proven risks, while letting BNG and EA regimes govern the rest.	A local policy is necessary to protect the range of locally designated sites in the city which are not protected in the same way as national sites in national policy. It also allows the Council to set out particular considerations and local requirements which are tailored to the variety of habitats and species present in Oxford.
G6	Noise and light pollution	Multiple comments say the policy should explicitly include noise and night-sky light pollution.	The policy currently names 'impacts from artificial light' as a potential impact however, as stated in the policy, this list is not exhaustive.
G6	General comments re: SSSIs in city	The number of wildlife SSSIs in poor condition is bad news for the city and evidence that wildlife is not thriving in many despite the condition assessments. Natural England's condition assessments are too out of date to be useful – disagree with condition assessment for New Marston	The condition assessments from Natural England are the most current source of information available to us, though we are aware that they have not been updated for some time. The Local Plan takes a precautionary approach to the SSSIs' protection, including mitigation requirements in any site allocations within proximity to the SSSIs and general

Draft Policy	Summary	Response	Outcome

		Meadows SSSI as overall favourable – no longer the case. Table of SSSIs should separate out the geological ones and whilst being in favourable status, this is for separate reasons to ecology.	requirements outlined in G6 that would apply to proposals elsewhere. We will try to ensure that the distinction between geological SSSIs and others is more clear when we reference them going forward.
G6	General comments re: local wildlife sites in city	Impression is given that all local wildlife biodiversity sites of merit and importance to the city have yet been identified and designated, but the city is far from having a full audit of wildlife rich areas and there are many with merit that are not designated (e.g. areas of Cutteslowe Park). Ecological Designation is biased towards sites the council actually owns, but there are many more designation-worthy sites in other land ownership e.g. half of Christchurch floodplain meadow; areas of calcareous alkaline spring-fen all around Headington; Ruskin College.	We acknowledge that there is a range of ecological potential outside of designated sites – this is why the first part of the policy sets out expectations for proposals (criteria a-c) which would apply anywhere in the city where there is a reasonable likelihood of adversely impacting semi-natural habitats or protected species.
G6	Allotments	Allotments can be crucial biodiversity areas for pollinating insects, even in urban areas. They are also a key part of	Allotments are protected in the Local Plan under Policy G1 including the three examples listed.

Draft Policy	Summary	Response	Outcome
		'improving the health and well-being of people' (one of the Local Plan's objectives). They provide opportunities food growing, recreation, relaxation and socialising on its open spaces. Therefore, Brasenose Farm, Fairacres and Cutteslowe allotments should be protected and not be classified as grey belt.	

G6	Wildlife sites connectivity	Wildlife sites within and outside the city are connected through green corridors. Support for city wildlife sites and green connectivity is not emphasised and should be. Dark zone connecting Magdalen Wood East and Magdalen Wood West is important for species movement e.g. bats and should be maintained. Green wildlife bridge across the ring road in this area is needed. Also flag concern that any building just outside the city limits has the potential to break/block the essential green	Policy G6 needs to be read in conjunction with the protection for the green infrastructure network (policy G1). We protect a much broader range of sites in the city as either core or supporting green infrastructure and part of the rationale is supporting a linked up network across the city. Policy G2's criteria also includes strengthening links between green spaces, particularly ecological sites
Draft Policy	Summary	Response	Outcome
		connectivity upon which wildlife within the city depends.	

G6	Protecting Lye Valley	• Update to all Site Policies that impact the Lye (MROFAOF, SPE7, SPE6, SPE8) Request a formal survey and policy demarcation of ground, Thames Water and surface water catchments for the Lye Valley and other areas as per Lambeth where floods have, and could potentially, cause damage.	Policy G6 sets the framework of protection for the sites within the Lye Valley and sets out what applicants are expected to do to avoid adverse effects wherever proposals could lead to them. The specific site allocations that are located within impact risk zones for the Lye Valley will include requirements for mitigating risks also. Flood risk is dealt with through policy G7 and mapping of flood risk is included in the Strategic Flood Risk Assessment.

Statutory Consultee Responses – Draft Policy G6

Natural England

Draft Policy	Summary	Response	Outcome
G6 – protection of SAC/SSSIs	Welcome the commitment to safeguard key sites within Oxford's ecological network which include Oxford Meadows SAC and the numerous SSSIs. Encourage the Council to identify those site allocations which are proposed on land immediately adjacent to the SAC and SSSI's and stipulate within the allocation policy	We are undertaking a Source Pathway Receptor Analysis for the SSSIs as well as Habitats Regulations Assessment for the SAC and this will help identify all the relevant sites that might impact on these	Source Pathway Receptor Analysis and HRA work to be published alongside Reg 19 consultation. Key findings will be reflected in relevant allocations including sitespecific mitigation

Draft Policy	Summary	Response	Outcome

	that appropriate buffering and delivery of habitat supporting the interest features of the designated site will be required.	designations, in line with your comment. We will ensure any recommendations from that work, including sitespecific mitigation requirements, are reflected in the relevant allocation policies.	requirements where necessary.
G6 – Irreplaceable and priority habitats	Encourage the Council to be ambitious in terms of the protection, enhancement and strengthening of the ecological network and suggest that you include a commitment to the protection of irreplaceable habitats and priority habitats such as lowland fen, within the policy wording.	See our other response re: priority habitats. In relation to irreplaceable habitats, whilst we would contend that it is not necessary for the policy to repeat national policy, we have however incorporated an amendment into the policy wording in response to this comment (and others).	Policy updated for Reg 19.
G6 - LNRS	Encourage the Council to consider the Oxfordshire Nature Recovery Network and emerging Oxfordshire Local Nature Recovery Strategy. LNRSs have been designed to help local planning authorities deliver existing policy on conserving and enhancing biodiversity and to reflect this in the land use plans for their area. Given that national guidance on LNRSs and their	The Council has sought to ensure the LNRS is reflected in several ways through the Local Plan. We have included specific references to it and the opportunities it identifies within certain site allocations, and have made sure the offsite BNG	No further action proposed at present.

Draft Policy	Summary	Response	Outcome
	relationship to strategic planning is still in development, it is recommended that Local Plan policy recognises and references its support to the delivery of the emerging NRN and LNRS covering the area.	hierarchy references LNRS areas within its steps where onsite BNG is not feasible. Policy G6 protects designated sites which are identified as having existing importance in the LNRS, meanwhile policy G1 protects a network of green spaces, many of which are also opportunity areas for enhancement identified in the LNRS.	

Sports England

Draft Policy	Summary	Response	Outcome
G6	Sport England is concerned about what this policy means for any playing fields or other sports facilities within these designated areas. It is not unusual for grass pitches to be located next to or within local wildlife sites (or similar designations). With reference to the playing pitch strategy and other	The policy relates to mitigating adverse impacts or additional pressures to designated sites that may arise as a result of new development. There are unlikely to be locations where there are permitted established uses that are incompatible with the sensitivities to designated sites.	No further changes proposed.

Draft Policy	Summary	Response	Outcome
	documents that record playing fields and recreation facilities the Council must carefully balance any new policies that could prevent Oxford's residents from enjoying the outdoors and keeping physically active. Often natural areas can benefit humans and nature so encouraging policies that support but must be given appropriate consideration in an urban environment.		

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome
Policy G6 Protecting Oxford's biodiversity	Strategic Planning The Oxford Meadows Special Area of Conservation is the largest SAC in the county and much of it lies within Oxford City's boundary. This SAC, together with Sites of Special Scientific Interest and areas identified as at risk of flooding cover much of the other undeveloped land in the City, and therefore these issues are very significant in the Oxford City context. This policy	Noted.	No Action Required

Draft Policy	Summary of comments	Response	Outcome

	establishes the importance of protecting sites in accordance with a hierarchy, which is welcomed. Landscape and Nature Recovery – Biodiversity It is appreciated that groundwater catchment areas for Oxford Meadows SAC, Lye Valley and New Marston Meadows SSSI's have been specifically highlighted within this policy. It may be useful to highlight that other designated sites may also be impacted hydrologically, and this should be considered as part of an application. Reference to Road Verge Nature Reserves (RVNRs) as a type of non-statutory designated site would be welcomed within this policy. Further information regarding RVNRs and RVNRs within Oxford city can be found at https://www.oxfordshire.gov.uk/sites/default/files/file/countryside/RVNRSurveyReport.pdf. The supporting text to the policy includes references to the emerging Oxfordshire Local Nature Recovery	We are not considering hydrological evidence for other designated sites. We can consider the inclusion of a reference to this within the policy/ plan. We can consider this if the study is published/ adopted in	No Action Required Oxford City Action: Consider proposed wording going forward. Oxford City Action: Consider proposed wording going forward.

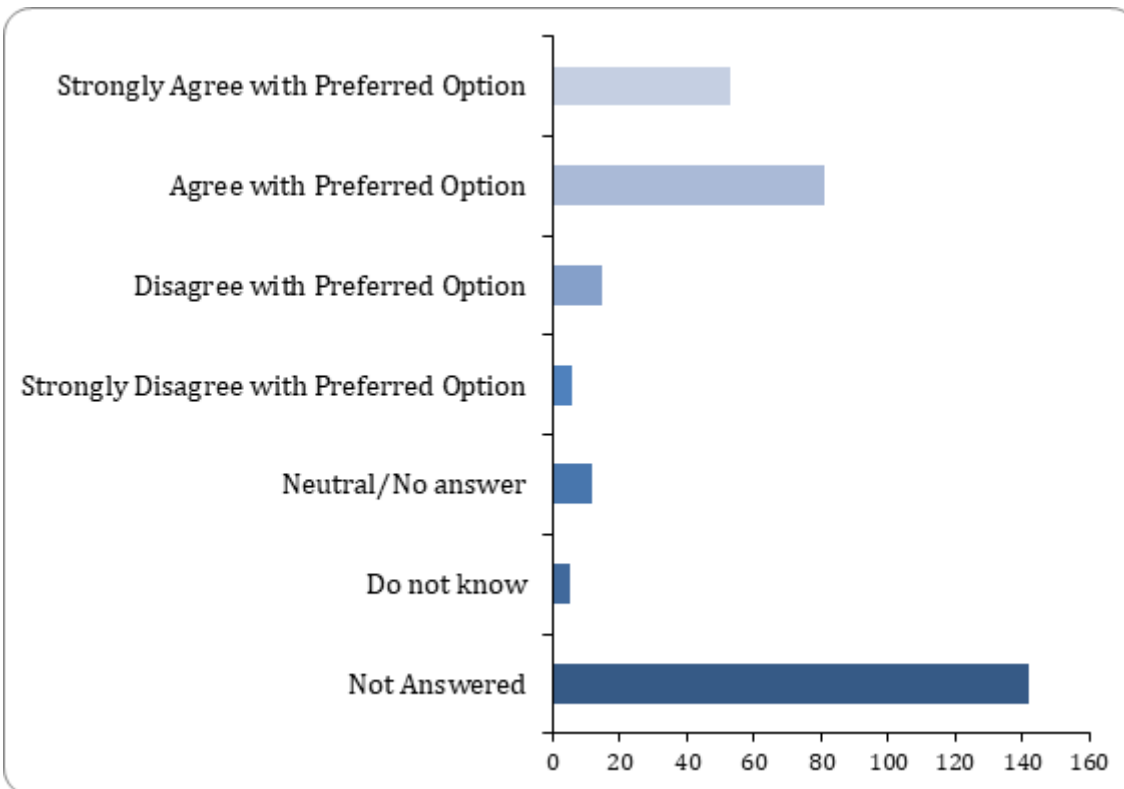
Draft Policy	Summary of comments	Response	Outcome
	Strategy (OLNRS). Consideration should be given to whether it should not also be referenced in the policy text.	a timely manner to meet our plan-production deadlines.	

All Public Responses – Draft Policy G7

Flood risk

Please tell us what you think of policy options set 007a (draft policy G7): Flood Risk and Flood Risk Assessments

There were 172 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	53	16.88%
Agree with Preferred Option	81	25.80%
Disagree with Preferred Option	15	4.78%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	12	3.82%
Do not know	5	1.59%
Not Answered	142	45.22%

Draft policy	Topic	Summary of comments	Response
G7	Policy is ineffective	Policy is ineffective as development in Flood Zone 1 areas has caused by run-off repeated flooding in Flood Zones 2 and 3. All development must demonstrate net-zero greenfield runoff rates to stop downstream flooding. Increasing and intensive urbanisation including from transport infrastructure is a far greater cause of floods than climate change, yet it is not even acknowledged. Requirement of a proportional FRA for all flood zones including offsite cumulative risk, as well as ensuring that sites in Flood Zone 1, that are surrounded by Flood Zone 2/3 land would still require safe access/ egress during a flood event.	All sources of flooding must be considered for any site including risk of surface water flooding in Flood Zone 1. The Level 1 SFRA considers the cumulative impact of development on flood risk within the catchment. Safe access/ egress to the site would be assessed as part of the planning application.
G7	Preferred Option	Agree with Preferred Option, but not with point k), as redevelopment should be allowed to encroach into Flood Zone 3b as it could still result in a decrease in flood risk through careful design.	The Environment Agency has been clear that this approach is unacceptable. Careful design can avoid redevelopment of a site encroaching on Flood Zone 3b.

G7	Support Alternative Option 1	Strongly agree with Alternative Option 1 - prevent development of greenfield sites within flood zone 3a, but with specific exemptions (e.g. for allocated sites).	National policy does allow for some types of development in Flood Zone 3a but for more vulnerable development such as housing, the Exception Test

Draft policy	Topic	Summary of comments	Response
			would be required and need to be passed.
G7	Support Alternative Option 2	Strongly support Option 2 - just rely on national policy. This policy should only include locally specific flood risk mitigation requirements that are not previously covered in national policy. National policy already demands a sequential test, an exception test and site-specific FRAs. The requirements in Policy G7 would add blanket FRAs for a minor development in the city which is considered too onerous and would slow brownfield intensification.	Oxford has a unique flooding environment and particular constraints on development in the city. There is a risk that a more generalised approach misses opportunities to address this.

G7	Do not allow development in the flood plain	No development should be allowed on the flood plain. They are also important ecological habitats for nature plants, insects and animals.	This approach could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing need, which could come forward designed in a way that is safe from flooding, does not displace flood risk elsewhere, and is in accordance with the NPPF.
G7	Do not allow development in Flood Zone 3	No development should be allowed in Flood Zone 3b. Should be a ban on development on low-lying Flood Zone 3 land as flood defences do not protect against groundwater flooding.	This approach could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing need, which could come forward designed in a way

Draft policy	Topic	Summary of comments	Response
			that is safe from flooding, does not displace flood risk elsewhere, and is in accordance with the NPPF. All sources of flooding must be considered for any site, including groundwater.

G7	Climate change not considered	The whole plan envisages much too much development on land prone to flooding e.g. many of the specified sites. Climate change means there will be an increased risk of storms and flooding, and the categorisation of land may already be out of date. It is unreasonable to expect residents or businesses whose neighbouring property becomes liable to flooding to suffer this so that developers can benefit from building on flood prone land.	National guidance is clear that flood risk must be considered now and for the lifetime of development – climate change projections are considered.
G7	Other sources of flooding	Applicants should be required to consider flooding from all sources, not just fluvial. Additional controls are required re basements which should be forbidden in 3b and 3a where fluvial flooding has occurred in last 10 years. Assumptions must be made that flooding will become more frequent, both fluvial and pluvial, as evidence is already suggesting. The flood risk maps do not adequately take account of pluvial flood risks, especially where	National policy and guidance dictates that all sources of flooding must be considered. In March 2025, the Environment Agency updated their mapping for flood risk which included showing surface water flood risk.

Draft policy	Topic	Summary of comments	Response

		large scale development has taken place in the neighbourhood.	The policy states that proposals for basement accommodation within Flood Zone 2 or 3 will not be permitted due to the unacceptable additional risks associated with this type of accommodation.
G7	Importance of natural flood prevention measures	Any natural flood prevention measures such as tree planting and rewilding would be preferable to more concrete and drains. Policy needs to stress more clearly that the biodiversity value of the SuDS scheme must be maximised. Water that is currently retained by the extensive vegetation and the clay soil such as at North Oxford Golf Club will enter the drainage system so much more quickly in the future once it is developed.	Draft Policy G8 addresses Sustainable Drainage Systems (SuDS) and the importance of green SuDS.
G7	Canal & River Trust	Navigation authorities should be consulted by the local planning authority concerning sites adjacent to, or which discharge into, canals – especially where these are impounded above natural ground level. Happy to help with the evidence for the SFRA where possible, despite the PPG not	Noted.

Draft policy	Topic	Summary of comments	Response
		specifically recommending consultation with the Canal & River Trust.	

Statutory Consultee Responses – Draft Policy

G7

Environment Agency

Draft Policy	Summary of comments	Response	Outcome
Policy G7 Flood Risk and FRAs	Suggested a couple of minor changes to the wording in the policy in respect of criteria e) and n). Detailed comments were received in respect of the OFAS (Oxford Flood Alleviation Scheme), Strategic Flood Risk Assessment (SFRA) and the proposed site allocations.	Agree with the suggested amendments. Noted – work is ongoing to resolve comments.	Criteria e) and n) of the Policy has been amended to incorporate the suggested wording. These comments will be addressed in detail in the Statement of Common Ground

Oxfordshire County Council

Policy G7 Flood Risk and FRAs	LLFA No further comments Landscape & Nature Recovery – Landscape	Noted.	No Action Required

Draft Policy	Summary of comments	Response	Outcome

	The reference in the policy to the multi-functionality of SUDS is supported. It is recommended that SUDS are designed in a way that they are attractive spaces that offer landscape, visual, ecological and recreational benefits	Noted.	No Action Required

Thames Water

Draft Policy	Summary	Response	Outcome
G7 Flood risk	Generally support Policy G7 as it is in general accordance with the NPPF and the PPG, particularly support the reference to sewer flooding.	Support welcomed.	N/A
G7 Flood risk	Flag that often infrastructure for sewage treatment is located close to rivers. It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept	Noted.	N/A

Draft Policy	Summary	Response	Outcome
	that water and sewerage infrastructure development may be necessary in flood risk areas.		

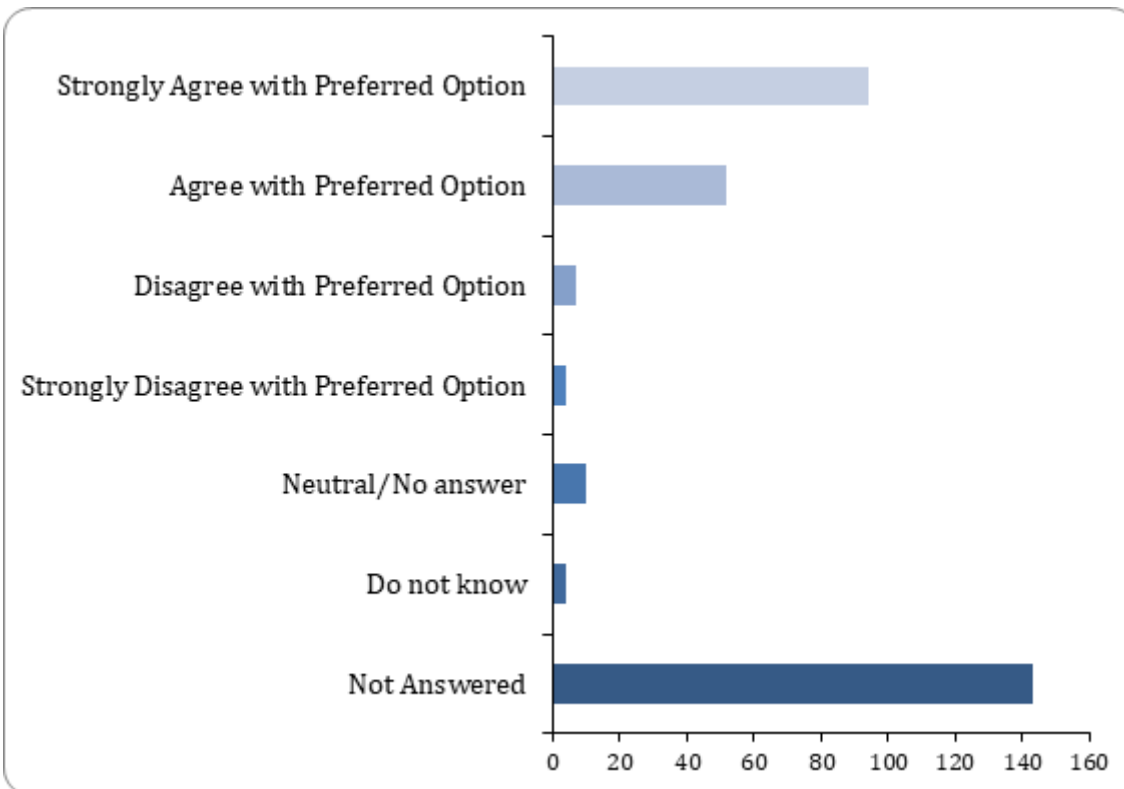
G7 Flood risk	Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.	The policy is clear that applicants need to consider flooding from all sources, which would include sewer flooding. It also sets out that an FRA should demonstrate that the proposed development would not increase flood risk offsite;	No further change proposed at this time.

All Public Responses – Draft Policy G8

Sustainable Drainage Systems

Please let us know what you think of policy options set 007b (draft policy G8): Sustainable Drainage Systems (SuDS).

There were 171 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	94	29.94%
Agree with Preferred Option	52	16.56%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	10	3.18%
Do not know	4	1.27%
Not Answered	143	45.54%

Draft policy	Topic	Summary of comments	Response
G8	Additions to Preferred Option	Developers should first be encouraged to integrate closed-loops systems into their designs, such as systems to catch and clean or reuse greywater (e.g. handwashing and showers to flush toilets); urine-diversion dry composting toilets; rainwater harvesting. Object to discharge to a combined sewer even in exceptional circumstances. This should not be built in at the design stage.	Noted. This is at the bottom of the drainage hierarchy, and it is expected that applicants would need to sufficiently demonstrate why all other options would not be possible.
G8	Support Alternative Option 1	Development should not be allowed on sites where SuDS are not feasible. There should be no exceptions from the requirement to provide for satisfactory drainage of all new properties. There is a danger that arguments for sites not being feasible will be put forward. Do not rely on national policy – should be done locally as requires local knowledge.	The draft policy echoes Paragraph 181, bullet c) of the NPPF (2024) which expects SuDS to be incorporated as part of any planning application <i>“unless there is clear evidence that this would be inappropriate”</i>. Support for additional details is welcomed.

G8	Support Alternative Option 2	Do not include a policy about SuDS but rely on national policy instead.	Guidance in national policy about SuDS is limited in terms of 'good design' and regarding wider objectives (e.g. water

Draft policy	Topic	Summary of comments	Response
		National guidance already obliges major schemes to incorporate SuDS and demonstrate they mimic natural run-off. Draft Policy G8 would go much further, demanding SuDS on every application and banning grey SuDS. The cost of this would mean very little brownfield development in Oxford would come forward.	quality). The policy provides additional detail, e.g. design standards which are specific to Oxford.
G8	Local requirements	Reduce the mandatory development site size for SuDS to 50/5000sqm/100, especially where upstream from previously flooded downstream sites. 100 dwellings far too high. 20 would be better.	As per the NPPF (2024), SuDS should be incorporated as part of any planning application unless there is clear evidence that this would be inappropriate.
G8	Grampian condition required	A Grampian condition for all development in Oxford should be required to ensure Thames Water can manage surface runoff.	It is not practical to do this - each planning application is assessed on their own merits.

G8	Green SuDS and drainage hierarchy	Add that actual SUDS mean areas of vegetation - preferably including trees - to ensure long-term drainage effectiveness. Without enforcement, SUDSs are alleged rather than effective. Actively discourage the use of paving or decking. Encourage use of water butts to capture rainwater and then use it to water gardens. This reduces the	The draft policy can only apply to new development, but green SuDS are prioritised. Any new proposals must submit a maintenance plan demonstrating how SuDS will be managed and remain effective for the lifetime of the development.

Draft policy	Topic	Summary of comments	Response
		amount of water in drains and allows absorption of surface water.	Drainage hierarchy in this policy prioritises storing rainwater for later use.
G8	Drainage concerns in Lye Valley	No further development (including house extensions) should be permitted to connect to the Thames Water sewer network within the Lye Valley fen catchment. Smaller extensions are only acceptable if they connect to a soakaway but not into the surface water drainage system. SuDS infiltration in Lye Valley is insufficient as a replacement for loss of natural surface cover.	It is not practical to have a blanket ban on development in the Lye Valley. Each planning application is assessed on their own merits. The draft Policy acknowledges that infiltration will not always be the most suitable means of SuDS.

G8	Inconsistency with national policy	Para.182 of the NPPF states that SuDS should be “ <i>proportionate to the nature and scale of the proposal</i> ”. It is not proportionate to require all development proposals to provide SuDS and the caveat “ <i>where feasible</i> ” does not appropriately cover the conditions where SuDS would not be required.	The draft policy echoes Paragraph 181, bullet c) of the NPPF (2024) which expects SuDS to be incorporated as part of any planning application “unless there is clear evidence that this would be inappropriate”.
G8	More flexibility in policy required	Draft policy is too rigid. Below ground features should be allowed in situations where site constraints exist e.g., groundwater, contamination, land-use efficiency, whilst still enabling SuDS to be used where appropriate.	Green SuDS are often considered at too late a stage in a scheme. If they are considered in the conceptual and design stages, they are more likely to be able to be well-designed into
Draft policy	Topic	Summary of comments	Response
			the proposal. They can provide a multitude of benefits that grey SuDS can’t, including providing open space for recreation, habitats to support wildlife and adaptation to other climate hazards such as overheating.

Draft Policy	Summary	Response	Outcome
	existing (older) surface drainage systems with sustainable urban drainage systems (SuDS).		

Statutory Consultee Responses – Draft Policy G8

Natural England

Draft Policy	Summary	Response	Outcome
G8	Fully support the requirement for SuDS on all new development. Recommend that SuDS are linked up wherever possible (including with other greenspace) to achieve greater benefits for water management and wildlife, to contribute to green infrastructure and support robust ecological networks. Given the risks to water quality which can be presented by antiquated drainage systems, also advise considering whether developments could be supported and encouraged to replace	Welcome the support and agree with the comments, though we would suggest these are better placed in supporting guidance which could help in implementing the Local Plan's requirements.	Consider how these points could be picked up in a future Technical Advice Note in due course.

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

Policy G8 SuDS	LLFA The policy refers to the Local Standards produced by the LLFA. This reference should be removed and/or replaced in the policy text with reference to any National Standards. The local standards are currently being reviewed following the DEFRA update Standards on 19th June 2025 and could be considered to not be up to date. Where a policy relies on these standards it needs to be able to be updated as the standards may develop further in the future.	We can consider how to address this issue. However, presumably once the LLFA standards have been updated, there will be no longer a need to rely on the national standards?	Oxford City Action: Consider proposed wording going forward.

Thames Water

Draft Policy	Summary	Response	Outcome
G8 SuDS	Support Policy G8 in principle. Flag that it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or	Noted – the SuDS policy sets out various requirements which seek to ensure an	No further change proposed at this time.
Draft Policy	Summary	Response	Outcome
	surface water sewer in accordance with the drainage hierarchy.	appropriate drainage strategy is pursued including prioritising green, multifunctional SuDS features where possible before other options.	

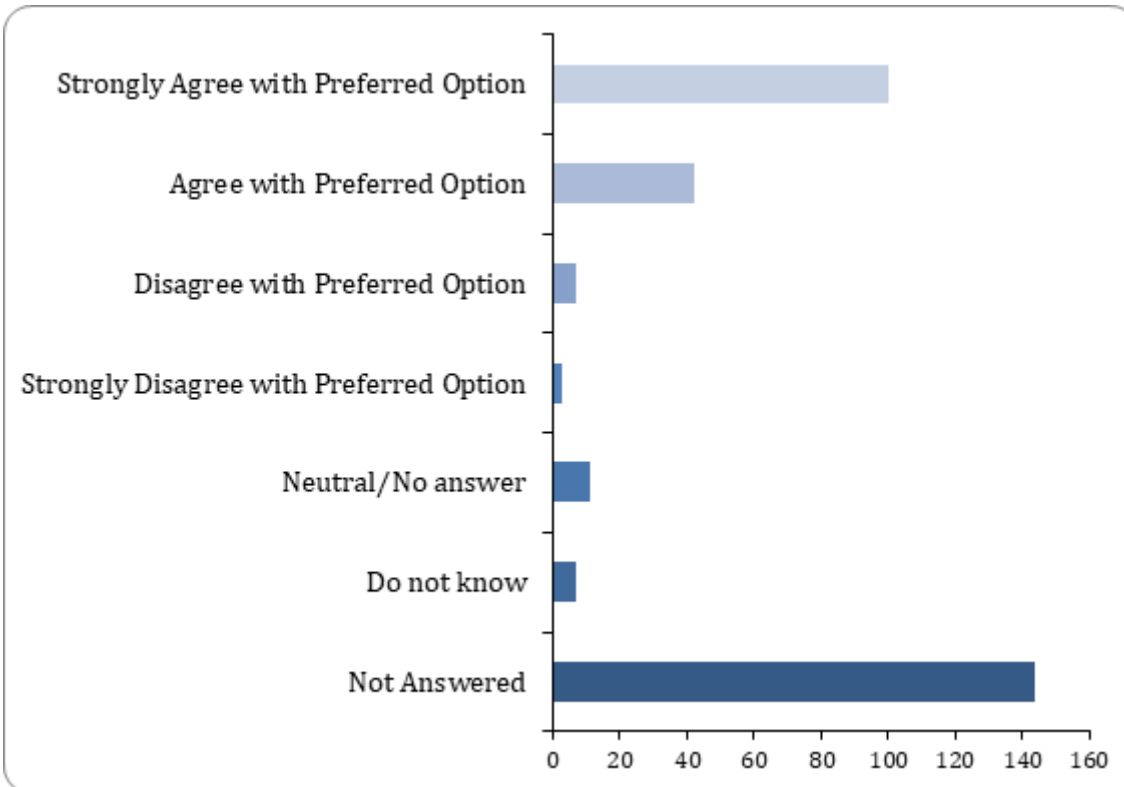
G8 SuDS	Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system.	Policy R5 – water resources and quality sets out requirements for separating foul and surface water on new development and encourages applicants to take opportunities to separate these on existing development.	No further change proposed at this time.
G8 SuDS	Flag that SuDS don't just help with flooding but also improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.	Agreed, the policy context (supporting text) will set this out clearly.	Updated policy to be published as part of Reg 19.

All Public Responses – Draft Policy G9

Resilient design and construction

Please tell us what you think of policy option set 008d (draft policy G9): Resilient design and construction.

There were 170 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	100	31.85%
Agree with Preferred Option	42	13.38%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	3	0.96%
Neutral/No answer	11	3.50%
Do not know	7	2.23%
Not Answered	144	45.86%

Draft Policy	Summary	Response	Outcome
G9	Preferred option	Support option 1 - Promote sustainable development, climate adaptation, energy efficiency and offsetting adverse environmental effects. More likely to ensure requirements are not watered down in practice.	Noted
G9	Preferred option	Comments in support of option 1, other comments were expressing support for 2 and/or option 3.	Noted – the background paper set out the rationale for the Council’s preferred option.
G9	General support for the policy	All elements covered by the policy are extremely important.	Noted – support welcomed.

G9	Adaptation should be prioritised over carbon reduction.	Climate adaptation (to overheating, rain) should take priority over carbon footprint.	Noted – however, we do not consider it to be an ‘either/or’ choice. There are important reasons to pursue both aspects of the climate change response. Cutting emissions helps to avoid impacts of more pronounced hazards in future, but adapting to risks now helps to lessen their impacts, particularly where these cannot be avoided, and can secure multiple other benefits for people.

Draft Policy	Summary	Response	Outcome
G9	Need for proportionality for minor development.	Policy objectives are reasonable but also important to ensure proportionality of such requirements for minor developments or they will be unaffordable.	Noted – whilst the policy sets out the key things an application should respond to, it is flexible in the level of detail an application should provide, allowing this to be proportionate to the scale of the development.

G9	Additional costs for residents	Concern about more costs imposed on residents.	See response above re: the flexibility allowed for in how applicants respond to requirements. We would add that incorporating these resilience measures into a development during construction should be cheaper and easier than retrospectively trying to incorporate these into a building in future after it has been constructed. A resilient development can also help to save occupants in terms of the costs that could arise when a hazard like flooding or overheating hits by lessening the impact and helping to recover quicker.
G9	No need for local policy and/or concern	Should defer to national requirements. Some requirements e.g. Noise, lighting, dust and fumes are already tightly	Concerns noted, however, the Council considers the policy to take a pragmatic and proportionate

Draft Policy	Summary	Response	Outcome

	about additional complexity to planning process	controlled through the NPPF, Building Regulations, the Environmental Protection Act and construction-management conditions. Bespoke local rules simply repeat those safeguards while forcing applicants to commission yet another impact statement and negotiate yet another set of mitigation measures, increasing cost and delay without delivering any extra protection. Concern about more complexity in planning process and whether the Council will have resource to assess applicants' submissions or defend the requirements.	approach to ensuring new development is designed to incorporate resilience to current and future climate change. This responds to the increasing climate change risk that faces the city (and the fact that Oxford is already at increased risk compared to other areas in the county). Whilst some requirements may be nationally set, other elements are not enforced nationally. The policy is clear that where evidence has been produced to meet other requirements, this can be referenced. It also helps to ensure that other elements of climate risk are considered.
G9	No need for local policy	Comments expressing no need for local climate policies, or that the Council should not meddle and should leave decisions to developers and their investors – no further reason given.	Noted – see earlier responses which set out why we consider this policy to be important.

Draft Policy	Summary	Response	Outcome

G9	Requirements should be stronger for new build and retrofit.	Requirements for new build/retrofits to have solar PV, heat pumps, green roofs in selected location should be made stronger.	These requirements are set out in other policies e.g. R1 deals with requirements for renewables and G2/G3 deal with requirements for additional greening.
G9	Policy should have defined catchments	Policy needs to define catchment ranges over which its requirements apply.	The policy applies across the city though certain risks will be higher in certain areas depending on proximity to certain hazards (e.g. flood plain).
G9	Requirements should apply to all sites/development	Requirements should apply to all sites/developments.	Noted – the policy applies to all proposals excluding householder applications (though these may be subject to other requirements elsewhere in the Local Plan). There is, of course, nothing preventing householders from following the principles of the policy also, and this would be encouraged.
G9	Assessments/mitigations should be informed by expertise	Assessments/mitigations should draw upon the (funded) expertise of local environmental charities i.e. BBOWT and Earth Trust.	The policy does not specifically flag particular stakeholders that applicants should engage with as this could change throughout the plan's lifetime and will also depend on the

Draft Policy	Summary	Response	Outcome
			context of each application. Where necessary, applicants may of course benefit from additional expertise to inform particular aspects of their application and this would help in evidencing how they have met the requirements.
G9	Support addressing risks of overheating	Experience of working in buildings constructed before concerns about heatwaves/overheating were common shows that preparing for these impacts is essential. Some classrooms becoming unusable in heatwaves. Need good design/ventilation as well as trees to mitigate impacts.	Noted – the policy emphasises the need for addressing overheating and having a cooling strategy (addressing inside and outside exposure to heat) as one of its criteria.
G9	Should assume future impacts will be worse	Should assume that the worst floods in the future will be worse than those in the past.	In principle, this would align with a precautionary approach, although the picture of how flood risk is likely to change in future depends on various factors and will not be the same everywhere. We have incorporated wording into the introduction to the subsection of the chapter containing policies G7-

Draft Policy	Summary	Response	Outcome
			G9 which flags to applicants how we expect climate hazards in the city to worsen over time.
G9	Development in flood plain not suitable	Site which is part of a flood plain such as Marston Rd. and land behind and surrounding St. Clements Church seems not to be a good candidate for building on.	Where proposing development in areas of flood risk, applicants will be expected to follow the requirements of the Local Plan's flood risk policy alongside this policy.
G9	Require ground water and surface water studies	Require professional ground water and surface water studies and their impacts on ALL developments.	This is not considered to be a proportionate approach – some development has more risk of adverse impacts on ground water or surface water than others. Other policies set out requirements for additional evidence where necessary in response to potential impacts e.g. on flood risk (G7) or ecology (G6).
G9	Groundwater	Do not address ground water / Do not address ground water and surface water impacts on sensitive sites.	See response above

Draft Policy	Summary	Response	Outcome
G9	Excess water demand and hosepipe bans	Already have excess water demand and hosepipe bans.	The Local Plan includes a separate bespoke policy on water resources and water quality (policy R5). This policy cross refers to that policy and emphasises the need for water saving measures in light of added stresses on resources that are expected as summer become hotter and drier in future.
G9	Lye Valley	Current drainage flowing into Lye Valley needs to be assessed. Development is the biggest threat to the Lye Valley and should not be permitted. Lye Valley is an amazing resource and should definitely be strongly protected.	See responses against policy G6 in relation to Lye Valley. The policy applies to all proposals excluding householder development, wherever they are proposed in the city. Particular areas are neither scoped in or out of where the policy applies.
G9	Extend same approaches for Lye Valley to wider city.	Agree with approach and flag that what is good for the Lye Valley could and should become applied throughout the Oxford City Council area.	Noted – in a general sense this may be true, however, there could be other contextual considerations which will impact levels of climate risk in different parts of the city and

			should inform the interventions incorporated

Draft Policy	Summary	Response	Outcome
			into a development to address climate change hazards.
G9	Protect green and blue infrastructure	Protect our green and blue infrastructure at all costs.	Separate policies in the Local Plan seek to protect the green infrastructure network (see policy G1 in particular). The supporting text to G9 will also emphasise the valuable role green features can provide for adaptation.
G9	Policy should apply to sensitive nondesignated sites	Should apply also to sites that are sensitive but not currently designated as protected/sensitive sites.	As per earlier response, the policy applies to all proposals excluding householder development, wherever they are proposed in the city. Particular areas are neither scoped in or out of where the policy applies.

G9	Overdevelopment in city	Concerns about overdevelopment in the city.	Concerns noted, however, new development is a necessary part of how the city will continue to function and support residents and businesses in the future. The Local Plan's role is ensuring that this development comes forward in the right way. The policies of the Plan need to be read as a whole. There are a
Draft Policy	Summary	Response	Outcome
			range of policies throughout chapters 4 and 5 which seek to mitigate the impacts of development, and/or secure improvements in the environment.
G9	BBOWT	Concern that the wording of Policy G9 does not seem to refer to and/or conflicts with the need for protections for Lye Valley and Lowland Fens habitats more generally.	The policy has a completely different focus – specifically, it is about driving more climate resilient design in new development. Protections for the Lye Valley and other habitats are dealt with through other policies – e.g. policy G6.

Statutory Consultee Responses – Draft Policy G9

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

2294

Draft Policy	Summary of comments	Response	Outcome
Policy G9 Resilient Design and Construction	Climate Action Support references to adapting to the impacts of climate change. Reference should be made to climate-resilient landscaping, e.g., “<i>Landscaping and green</i>	Noted.	No Action Required Oxford City Action:

	<i>infrastructure must be designed to withstand extreme weather conditions, such as heatwaves and droughts, through the use of drought-resistant plants, shaded areas, green roofs, and rainwater harvesting systems.”</i> Under (b) reference should also be made to cooling public space within the development, such as green roofs to reduce the heat island effect, shaded public space, and the use of light-coloured materials to improve outdoor thermal comfort. Under (d) examples could given for water efficient technologies, such as rainwater harvesting, low-flow plumbing, grey water recycling and smart irrigation. Urban Design (Placemaking) Resilient design could also apply to buildings and spaces being adaptable to changing uses and functions. E.g. Covid-19 led many empty office units, some of which may have been repurposed as residential since.	We can consider including a reference to climate-resilient landscaping. We can consider adding a reference to urban cooling although reference already exists in Policy G2. We can consider whether to include examples of water efficient technologies. Noted.	Consider proposed wording going forward. Oxford City Action: Consider proposed wording going forward. Oxford City Action: Consider proposed wording going forward. No Action Required

Thames Water

Draft Policy	Summary	Response	Outcome
G9 Resilient design	Support Policy G9 (d) where it refers to water efficiency in line with our comments to Policy R5.	Support welcomed	N/A

All Public Responses to the Whole of Chapter 4

Draft policy	Topic	Summary of comments	Response
Chapter 4	Explicitly state that greenfield will only be developed if no brownfield sites are available/meet needs	The consultation for the 2040 Local Plan in 2022 included this policy option: "Option for policy approach - Allow development on greenfield sites only if no brownfield sites are available and needs are not being met on brownfield sites." which BBOWT supported. We would have welcomed a similar option being available in this 2042 Local plan consultation. In considering this policy area we ask that the Council takes into consideration that in the report for the Issues Consultation for the Local Plan to 2040, 81% of respondents rated: "Safeguarding the natural environment and its wildlife habitat" as being "Very important", and that in total 96% of respondents rated it as being either "Very	A number of growth strategies are considered in the Sustainability Appraisal. Ultimately, the approach taken by the Plan is that all green spaces have been considered against the GI strategy for the level of protection appropriate to them, and the majority of green spaces in the city are strongly protected because of their value.

Draft policy	Topic	Summary of comments	Response
		important” or “Important”. And that 85% of respondents rated: “Preserving open spaces” as being “Very important”, and that in total 98% of respondents rated it as being either “Very important” or “Important”. Comparing these questions to all of the other questions that were structured in the same way in the 2040 Local Plan consultation, these two showed by far the highest % in the “Very important” category. We ask that Oxford City Council responds to this very strong indication from the people of Oxford of how important to them biodiversity and green spaces are by taking forward in the next stage of the plan policies that are exemplary and ground breaking in facilitating both the protection and enhancement of the biodiversity and green spaces of Oxford, protecting both accessible green spaces and those that are not open to the public. The survey for the 2042 Local Plan now under development gave the following results indicating very strong support for protection and enhancement of biodiversity in the City: “72.43% of respondents declared biodiversity to be very important them and	

Draft policy	Topic	Summary of comments	Response
		15.68% declared biodiversity to be slightly important to them.”	
Chapter 4	Supportive	Cyclox support all policies in this chapter	Support is noted and welcomed.
Chapter 4	Supportive	We very strongly support all these policies, especially E1 Protection of green infrastructure which we believe should be given very strong weight, reflecting the importance of Oxford’s network of green spaces to the character and setting of the city, the well-being of its inhabitants and climate resilience. There should be clear recognition that existing green spaces are a finite resource, not easily recreated when lost or damaged.	Support is noted and welcomed.

Chapter 4	General comment – Greater Oxford Nature Park	Oxford is not only important because of its urban wildlife, but also because of the access to these green spaces. The majority of these sites are publicly accessible, with footpaths along the Cherwell winding through the extent of central Oxford. I have regularly been able to lead wildlife education sessions here for both adults and students from primary school age to master's degree level. This is an incredibly important aspect of working in Oxford's green	Proposals for the Greater Oxford Nature Park is part of wider proposals for the Greater Oxford authority area, which is beyond the scope of the current consultation.

Draft policy	Topic	Summary of comments	Response

		spaces – everyone should be able to share, enjoy, and learn within them. Despite impressive efforts from education officers in organisations such as the Oxford Earth Academy, there remains much potential for wider outreach and education across the green space in Oxford. With the new Local Plan, there is a remarkable opportunity to join up and uplift these important green fragments across the city. It is critical that these green spaces are protected from the impacts of future development in Oxford. Damaging developments have already progressed despite major losses in biodiversity and in access for people to green space, such as in Spindleberry Nature Park in East Oxford.	
Chapter 4	General comment – Greater Oxford Nature Park	I am supporting the suggestion that is being discussed by a growing number of people that we need to value our green spaces in and around the city for nature based education. To be effective these spaces need to be accessible from schools and communities, biodiverse and	Proposals for the Greater Oxford Nature Park is part of wider proposals for the Greater Oxford authority area, which is beyond the scope of the current consultation.

Draft policy	Topic	Summary of comments	Response
		varied, connected with wildlife corridors to other sites to maintain biodiversity as this expands the effective space for species that need space, and large and diverse enough to cope with the numbers of young people in the city that need access to green spaces. Oxford has a really valuable asset in its 75+ green spaces which have a good level of biodiversity across the city. We could recognise these as a Greater Oxford Nature Park and develop a nature education strategy to boost the skills of our young people.	
Chapter 4	General comment	Please keep Oxford green and do not develop the green spaces around, thanks	Comment noted.
Chapter 4	General comment	Definition needs to be wider to include meadow, grassland, scrub, abandoned brown field site. All biodiverse sites and the connections between them.	Comment noted.

Chapter 4	Climate change and biodiversity	A network makes a lot of sense, and should be linked as much as is feasible. Climate change and the biodiversity crisis is by far the biggest	Comment noted.

Draft policy	Topic	Summary of comments	Response
		challenge we face... Too often planning application include a lot of greenwashing - it is difficult to quantify biodiversity loss and how to offset it. There could be a department employing ecologists... I am generally supportive of all things green. Hope you include schemes such planting pollinator friendly species, severely limit the use of pesticide, get on top of water pollution wherever possible, and so on.	

Chapter 4	Policies do not align with plan objectives	The perceptive and sympathetic comments re: value of green spaces to the community and wildlife contrast strongly with the draft policies which allow developers to get around any planning constraints in respect of green spaces. Draft policies do not sufficiently protect our green spaces and wildlife from development - to the detriment of our community, environment and wildlife itself. The Draft Plan's approach is largely homocentric, concentrating on how a green	The plan introduces a Green Infrastructure (GI) Network and categorises green and blue spaces "Core", "Supporting", and "All other". This evidencebased categorisation provides an appropriate system of protection across the entire network as the most valuable green spaces are protected.

Draft policy	Topic	Summary of comments	Response

		space benefits people rather than on its intrinsic value to wildlife itself. To develop land – whether for housing or other uses – is to privatise it. This Local Plan will result in privatising land which should be publicly accessible and depriving the community of amenities which benefit them. The Draft Local Plan prioritises development over the health and well-being of its citizens. This is not acceptable. It is not what people want.	
Chapter 4	Statutory weight of policies	Other concerns are held about the exemptions built into these policies. Having developed strong policies, we do not want developers to be able to easily avoid following them. As with other sections in this document, we would like to see more detail on the cases where exemptions to local plan policies will be allowed. We would also like to reiterate the need for developers to maintain biodiversity offsets in the medium to long term, to ensure this net gain is not lost.	Once fully adopted the local plan is a statutory document, and all planning decisions in Oxford will be required be in compliance with the policies it contains. The policies and supporting text will clearly set out the criteria against which proposals will be assessed. Exemptions do not

Draft policy	Topic	Summary of comments	Response
			apply as a matter of course for all policies and where they exist, will be narrowly focussed in order to make the policy more effective while not undermining the overall objective.
Chapter 4	Short survey wording	The statement within the wording of Question 2 of the Short Survey – which states <i>we think it is important that Oxford is a green biodiverse city....We are protecting our important green spaces and features</i> – is misleading. This is not what the Council is doing.	Comment noted.

Chapter 5 – A City that Utilises its Resources with Care, Protects the Air, Water, and Soil

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Headlines for Chapter 5:

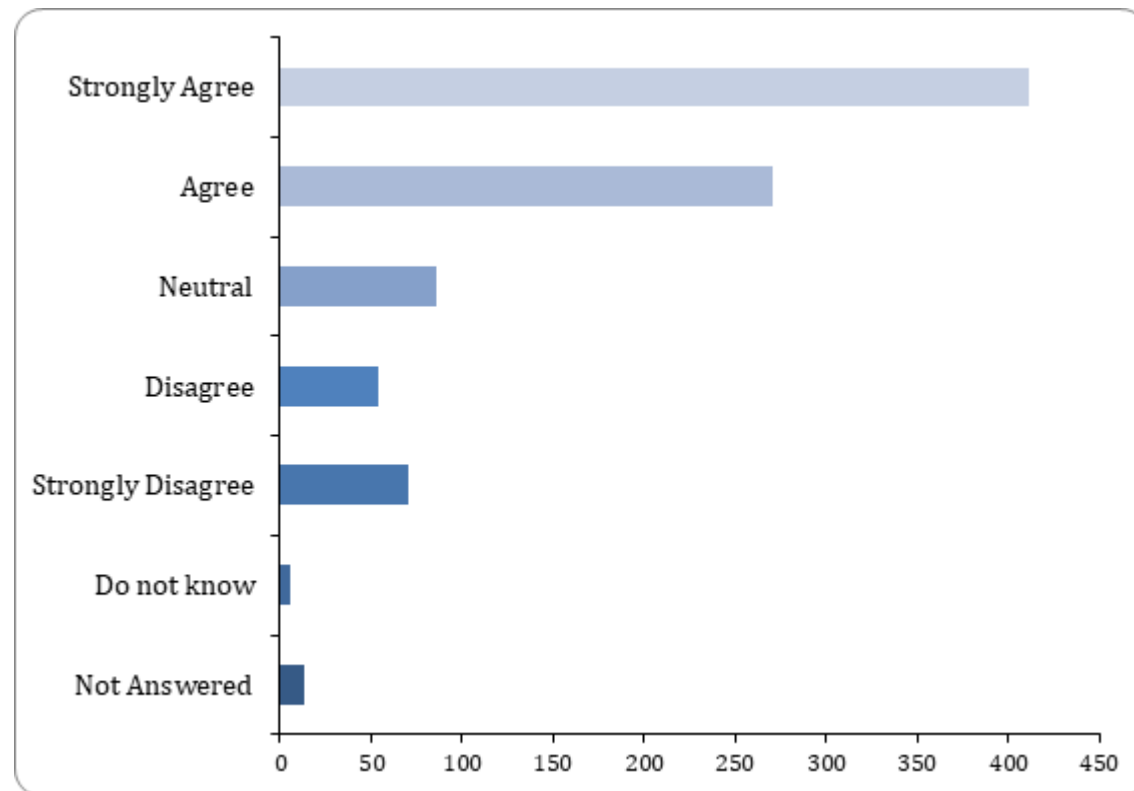
- General support for policies in this chapter
- Recognising the urgent need for these policies, and those in Chapter 4, to promote sustainable development, climate adaptation, energy efficiency and offsetting adverse environmental effects
- Support for carbon neutral development and more effective building design
- Concerns around carbon offsetting
- Further clarification requested over the scope of the policies
- Support for solar panels on housing and businesses
- Water quality and infrastructure should be a priority, and policies should go further

Short Questionnaire Responses

Net zero carbon

We have drafted a policy that requires all new buildings are net zero carbon in operation from adoption of the plan. In a few exceptional cases, payment to offset carbon impacts will be allowed (for example for hospitals, which need to use more energy than it is likely can be generated onsite). To what extent to you agree with this approach?

There were 898 responses to this part of the question.



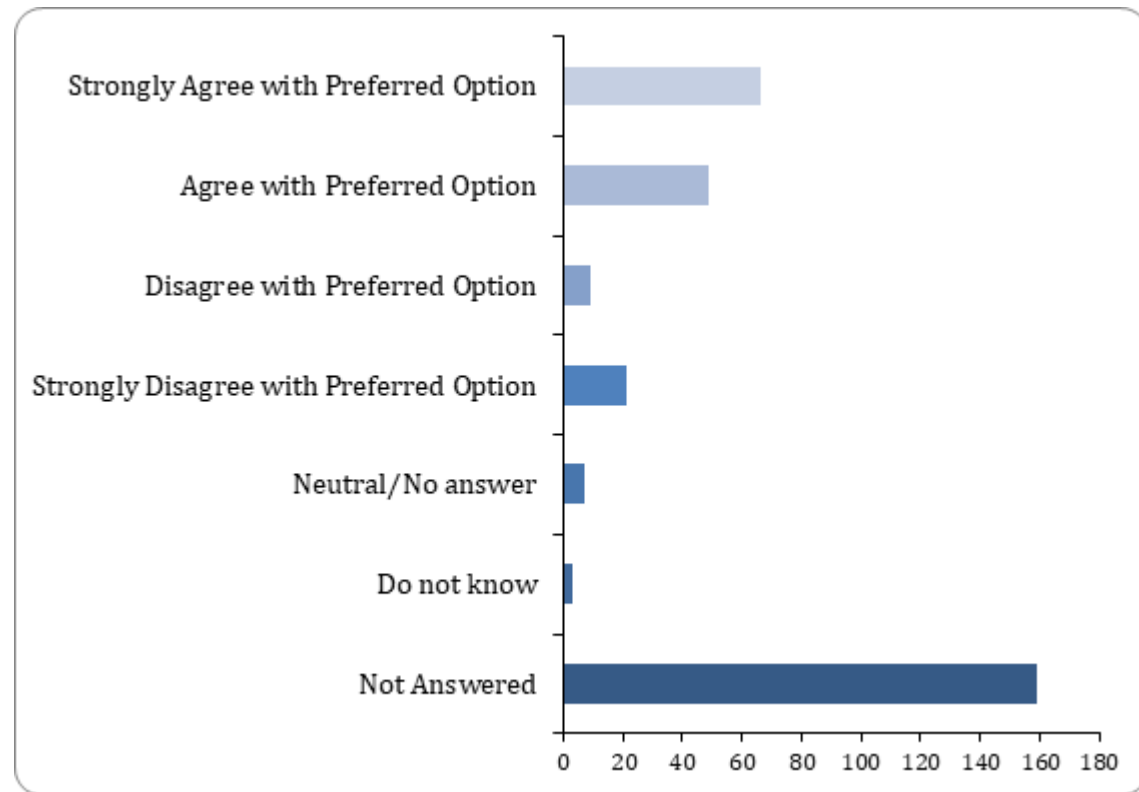
Option	Total	Percent

Strongly Agree	411	45.12%
Agree	271	29.75%
Neutral	86	9.44%
Disagree	54	5.93%
Strongly Disagree	70	7.68%
Do not know	6	0.66%
Not Answered	13	1.43%

All Public Responses – Draft Policy R1

Please tell us what you think about policy options set 008a (draft policy R1): Net zero carbon buildings in operation. If you have any additional comments please put them in the comment box below.

There were 155 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	66	21.02%
Agree with Preferred Option	49	15.61%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	21	6.69%

All Public Responses – Draft Policy R1

Draft policy	Topic	Summary of comments	Response
R1	Preferred option	Support for different options in consultation e.g. some flagged support for alternative option 1, whilst others supported option 2.	Noted.
R1	BBOWT	BBOWT strongly agree with preferred option.	Support welcomed.
R1	Support high standards	Support use of the energy efficiency hierarchy. Ambitious targets of measuring energy usage adhere to Passivhaus standards.	Support noted and welcomed.
R1	Welcome wording re: high energy demand non-resi uses	Various comments welcomed the changes to the policy requirements that have been made following previous representations (during Local Plan 2040 preparation), particularly in relation to ensuring that the exceptionally high energy demands of non-residential uses such as R&D/labs/hospitals are acknowledged and that higher EUI targets will be accepted where it is robustly justified.	Noted and support welcomed.

R1	Should incentivise going further	Preferred approach should be minimum, with incentives offered for greener design of buildings.	The policy sets a strong, minimum baseline within the boundaries of what is technically feasible and viable (which we have to ensure to deliver a 'sound' plan through the examination process). We have tried to ensure that climate change is an overarching thread that runs throughout the plan – which emphasise its importance as an issue to be addressed in a variety of ways. Going further than the minimum is of course to be welcomed.
R1	Oxford should lead the way	Oxford should lead the way and is well placed to deliver exemplary design.	Agreed – the strong suite of policies across the chapter as well as elsewhere (e.g. design policies) seek to encourage this.

R1	Policy should go further – all buildings should have solar PV	All new buildings should have solar pv on roof. Easier to install pv during construction than as retrofit. At least require that houses and new buildings have roofs that face the right direction. Buildings should go beyond net zero carbon emissions to optimising renewable energy generation where possible.	Whilst we agree in principle, the policy is technology agnostic in that it does not specify applicants should focus on any one technology. This leaves flexibility to respond to site conditions and also future-proof policy for new technological advances should they emerge. The requirement for matching energy demand through sufficient renewable energy generation seeks to ensure the capacity of microrenewable energy generation increases in tandem with energy demand. Implicitly this will most often be in the form of rooftop solar pv, but could be via other technologies where this could be more sustainable. Nevertheless, all new development should contribute to renewable energy generation, as would accord with the principle of this comment. Going beyond net zero is of course to be welcomed, we

			have ensured that the supporting text
			flags this could be possible in some instances.

R1	Should expand to incorporate BREEAM.	Policy R1 and its Energy Use Intensity (EUI) figures could be expanded upon to create some equivalency to BREEAM UK and/or other standardised measurements of development sustainability that are industry-recognised.	Noted – as the Local Plan is proposing high standards across various sustainability policies it was not considered necessary to require applicants to pursue separate certification, however, we will look to reference best practice standards in our supporting Technical Advice Note and applicants are not prevented from pursuing them if they desire.
R1	Oppose any allowance for applicants to avoid targets.	Strongly oppose any policies that enables applications to avoid the targets. If applications cannot meet the targets - even in exceptional cases - they should be refused. Also concerned about how the Council can enforce whether developers comply with the policy. If they do not comply with the meeting the targets - then strict sanctions should be enforced.	The policy sets out requirements that will need to be met for applicable planning applications. The approach to net zero design however is still evolving and there are potential challenges for certain typologies of development. Therefore, the policy sets out clear approaches to follow in circumstances where the criteria cannot be met. This is considered to be the most transparent and pragmatic way to set out how such situations will be dealt with in the face of

			the known (and unknown) challenges in implementing the

			new policy, whilst also maintaining the strongest position we can on this issue. Applicants would need to submit an energy and carbon statement detailing how they have met these requirements and the permission would be granted subject to a condition that the development is built in accordance with submitted documents. Were an applicant to fail to build in accordance with the condition they could be subject to enforcement action.

R1	Policy goes too far or is wrong priority	Approach is excessive. Net zero is contentious and politically charged. Milder policy needed with focus on adaptation. Oxford has more pressing problems than net zero/carbon reduction. Oxford has negligible impact on climate change. Should fund new technologies if this really is a priority.	National policy is clear that we need to support the transition to net zero by 2050 and take a proactive approach to mitigating and adapting to climate change. The city has a local net zero target of 2040. It is also a legal requirement of the plan-making process which would be tested for as part of examination. Beyond the benefits for reducing impacts on climate change, the policy has other drivers - including air quality (no direct burning of fossil fuels contributing pollutants),
			increasing energy security (more uptake of local generation), and increasing resilience to fuel poverty for occupants.

R1	Policy is wrong priority	Net zero is too expensive. Poverty and erosion of local services should trump eco concerns. Net zero will kill Oxford's economy. Affordable homes should be priority.	The impacts of climate change are unequal and expected to hit the most vulnerable, including those in financial or health deprivation particularly hard because they are less able to absorb or recover from the impacts. As such these concerns are intrinsically linked (it is not one priority instead of another such as affordable housing). See response above for why this policy is important for reasons beyond mitigating climate change impacts. In relation to cost of the policy, its development is informed by viability testing alongside other policies in the Local Plan.
R1	If not net zero right now, should push for net zero ready.	As well as off-setting, should require that buildings that cannot be fully carbon zero right now, be designed in such a way to facilitate becoming carbon zero at a future date e.g. capacity to install a heat pump or other.	Agreed. The energy offsetting requirement does not replace the need for meeting the other criteria of the policy – including no fossil fuels – which would ensure it is net zero ready.
R1	Requirements are too onerous	Concerned that these requirements would be too onerous and discourage new development.	This could be in relation to a couple of factors. Too onerous to

			achieve technically or in terms of ensuring a development is financially viable. On the first issue, the literature review included in the evidence base sets out the range of evidence from across the country that net zero in operation is technically feasible on many types of development. Where there could be challenges, we have included mechanisms in the policy – e.g. allowance for offsetting. On financial viability, the whole plan viability report details the testing of the policy alongside other requirements in the Local Plan which has informed the policy approach.
R1	Agree no fossil fuel should be allowed	Comments agreeing we should permit no fossil fuel use in new buildings.	Noted, welcome the support.
R1	Fossil fuels should be available as an alternative	Fossil fuels should be available as an alternative in case of power outages.	Noted. The policy aligns with local and national objectives.

R1	Wood-burning stoves	Would net zero houses ban open fires or wood-burning stoves? Another comment that wood-burning needs to be addressed through advertising and public education.	The policy sets the requirement for net zero development – it does not prescribe specific methods of heating which should be used to achieve this. Separate policy on air quality would also
			apply and any application proposing wood burning would need to comply with that as well as other local requirements – e.g. the city's smoke control zone which was expanded in 2024.
R1	Onsite renewable energy preference to meet energy balance	Concern that the high energy needs of some types of development (e.g. labs, life science buildings), mean it is wholly unrealistic for all energy needs to be met through onsite renewables. Non-residential uses will inevitably be required to pay an 'energy offsetting' fee.	Noted, however, meeting energy demand through energy that is generated renewably is a key component in net zero carbon design. The policy is as flexible as possible about how this is achieved. It does not require energy demand to be met through renewables onsite only, other options are allowing applicants to utilise offsite locations elsewhere in the city, or paying into the offset fund.

R1	Onsite renewable energy preference to meet energy balance	Requirement that all energy needs are to be met on-site through renewables before looking to offsite options is inefficient (e.g. requires designing for peak demand and would often lead to a lot of excess energy being sent to an already congested grid) and could mean the energy is simply wasted. Approach is also costly and will affect financial viability.	Matching energy demand with renewables, ideally onsite, is a key element of net zero carbon buildings in operation. The policy does allow for offsite solutions where matching energy demand through renewables onsite is not fully feasible.
R1	Onsite renewable energy preference to meet energy balance	Restrictions on sites with valuable heritage may not be appropriate for on site generation, further restricting the options available to the applicant.	The policy does not require all renewable energy demand to be met onsite, this is just the preference to reduce need for
		Another comment flagged the concern that the requirement to achieve energy generation to match needs on site is in conflict with other policies of the plan (such as Policy HD8, which seek to ensure best and efficient use of land.	offsite solutions. Where insurmountable heritage constraints did apply, this could be a reason for looking to offsite (or offsetting) to meet some of the energy demand. Policy HD8 is clear that net zero carbon design is one of the considerations that should inform built form/efficient use of land.

R1	More area-wide approach needed	Policy should be revised to support a more effective, area-wide approach - such as Local Area Energy Plans - and express interest in working with local authorities to develop this strategy.	Comment noted – the policy is focussed on design at the scale of new buildings, this does not mean that the Council is unsupportive of broader areawide approaches.
R1	EFW incinerator energy	Assume that energy use which is to be met through equal amounts of new renewable energy generation (ideally onsite) does not include the use of EFW incinerator energy? This is the dirtiest method of providing heating etc	The policy is not explicit about any particular technology that should be used to meet the requirements of the policy. The preference is that applicants will utilise the most effective and sustainable technologies for their particular site to meet the requirements. It is considered unlikely that an EFW solution would be put forward to meet energy needs of a specific development, but where that were the case, it would need to conform with all the policies in the
			Local Plan including those on air quality and amenity.

R1	More detail needed in relation to energy offsetting approach	Various comments wanting more detail on how the energy offset mechanism will be applied, including in relation to: - More transparency on what the charge will be and how it is calculated, as supported by evidence. - How the Council will use these contributions, as no fund, or schemes have been established to ensure that the contributions will deliver appropriate offsetting.	It is envisaged that the offsetting fee will be published on the website and updated when necessary (e.g. to reflect inflation). This will give applicants clarity on pricing in advance. The draft process for calculating the offsetting contribution will be set out in draft in the Reg 19 background paper and would ultimately be published as part of a Technical Advice Note. The way the fund will be managed and the fees utilised for projects will be further developed as the Local Plan progresses towards adoption, though this is a separate workstream to the Local Plan's development itself. We agree that it is important that the funds are utilised as effectively and transparently as possible, and to fund projects which deliver true offsetting within the city.

R1	Offsetting charge impact on viability	Concern offsetting charges lead to uncertainty around the financial cost on development. This is a further financial burden on commercial development which further calls into question the viability of such developments.	See response above which sets out how we will convey the price and process for determining offset fee in advance to applicants.
			Policy S4 details how viability concerns arising from offsetting will be addressed and includes a mechanism by which these can be reduced incrementally if needed, though the development will still need to meet the other requirements of R1.
R1	Audit trail for offsetting fund.	Council will need to ensure that it has a suitable audit trail for payments made and projects delivered and the amount of carbon offset.	Noted and agreed – this will be considered further as the process for managing the offset fund is further developed, which is a separate consideration to the Local Plan development.
R1	Oppose offsetting	Requirement that compensatory renewable energy capacity be onsite is a silly gimmick and should certainly not be law.	Offsetting is an option that can be used as a last resort, the preference is for applicants to meet the policy requirements in full through onsite solutions.

R1	Offsetting as last resort	Offsetting should be used only in extreme.	Agreed, the draft policy set out that it should only be considered as a last resort.
R1	Offset mechanism is a get out clause. If needed, should be spent appropriately.	Oppose the offset allowance – this is a get out clause for developers. If needed, offset fund should be directly used/ring-fenced by the City Council for the retrofitting of community buildings for community energy hubs, such as local schools, nurseries, village halls and community centres. Particularly targeting areas of highest fuel poverty.	Offsetting (as a last resort) is the most pragmatic way to address the challenges that some types of development will face in the context of existing technological constraints. Funds can help to deliver retro-fit to existing buildings which currently contribute to emissions. The
			process for spending funds and identifying suitable projects is subject to further work alongside the Local Plan. It is important that the funds are used to deliver true offsetting that would not happen otherwise and be in line with the objectives of the policy. We agree that, where possible, it would be valuable for these projects to also secure wider public benefits such as delivering retrofit to community buildings and those in greatest

			need, although the explicit criteria will need to be considered further.
R1	Have alternative forms of energy use rating been considered?	Despite different EUI targets for high energy use developments, concern that these and space heating demand targets are not useful for a number of building types which can make implementation more challenging. The use of the Display Energy Certificates (DEC) could be considered as this methodology allows for various building types within its methodology.	Using Energy Use Intensity as the key performance metric provides for a standardised approach to measuring performance across all buildings. All buildings should be able to calculate performance using EUI (overall energy use, divided by gross internal floor area). The specific EUI targets they can feasibly achieve may differ between typologies (hence different targets for resi/nonresi/high

			energy uses in the policy). It is also the performance
			metric recommended by a growing body of industry.
R1	Support in principle	Where applicants have limited land control, delivering renewables offsite is not likely to be achievable and, where the City already recognises a significant shortfall in land available to meet the City's need for housing, it is questioned how reasonable an approach this is.	The policy also allows applicants to pay into an energy offsetting fund where they are unable to deliver renewables onsite or on land elsewhere in their control.

R1	Objection (focus on viability)	Unclear how requirements have been tested in respect of sheltered and extra care housing proposals. Of the viability testing undertaken in respect of older person's housing in the 2023 study, there are multiple scenarios where even in the highest value bands and lowest benchmark land value scenarios, 0% affordable housing is viable and indeed, some of the land values generated are negative. This implies that there will be situations where the various sustainability enhancements are unviable for this typology. Recommend that viability evidence is updated to reflect comments before any enhancement costs such as proposed here may be considered viable.	The policy's development is being informed by whole plan viability testing. Comments from this consultation will be taken onboard where applicable.
R1	Concerns over viability and deliverability	The requirements of the policy may harm the viability of large schemes because of other requirement burdens. Meeting both regulated and unregulated energy targets entirely through onsite renewable energy is unlikely to be deliverable. The requirements add a costly compliance layer that the Plan itself admits will be "more challenging" and may require offset payments for high-energy research labs and hospitals. Viability impacts will push applicants to cascade and end up trimming off other public benefits like affordable housing.	The policy's development is being informed by whole plan viability testing. As set out above, where applicants are unable to provide enough onsite renewable energy generation to meet energy demand, the policy allows for other options (e.g. offsetting). The viability cascade as set out in policy S4 sets out a clear strategy for how contributions should be

			reduced, beginning with energy offsetting (development will still need to meet other requirements of R1), before looking to other topics like affordable housing.
R1	Policy exceeds national requirements	Concern that the Council is pushing for energy efficiency standards of new homes that go beyond the Future Homes Standard (FHS). Also concern that Council is going against Written Ministerial Statement of 2023. It was flagged that requiring net zero in line with building regulations has various advantages including requiring the same approach that all developers can understand and which can be rolled out at scale. Any jump in standards also necessitate phased transitional arrangements to enable market to adapt. Some comments were that the Council should stick to national standards (and set no local standards) in light of this. If going beyond current or future standards it must be done in a way that is consistent with national policy and Council should fully assess consequences (e.g. viability and feasibility).	Relying on national standards alone, even with the uplift that will be brought in through the Future Homes and Buildings Standard would not deliver truly net zero buildings in operation. The local policy is important for supporting the local net zero target of 2040; reducing the number of buildings that will require retro-fit in future; as well as reducing exposure of future occupants to risks of fuel poverty. The approach proposed is consistent with net zero carbon policies that are increasingly being adopted across the country and as is recommended by various national bodies.

R1	Alternative standards should be used – more aligned to Future homes standard	A pragmatic route would be requiring net-zero-ready fabric (national Part L uplift, no new gas) and let developers meet unregulated loads through market-led efficiency gains and grid-scale decarbonisation— as the Future Homes Standard is designed to do—while still encouraging onsite renewables where they are technically and economically rational.	Noted, see response above.

R1	Policy forces householders to seek alternative ways of heating extensions to main house.	The policy is not justified and is ineffective. Forcing householders (condition 4) to heat their existing homes with gas, but then with an entirely new method (non-gas) for a new extension. An acceptable solution should be to achieve a net improvement, e.g. a householder can insulate the rest of the house at the same time as the extension construction.	The draft policy set out that extensions are expected to comply with criteria 1-3, unless they would result in the creation of a self-contained dwelling or non-residential unit, in which case all criteria apply. As such the requirement for no fossil fuel in the extension is only engaged in the latter case (where the extension would result in selfcontained dwelling). We will look to whether there is a way to make this clearer in the Reg 19 draft.

R1	Policy is overly prescriptive, lacks flexibility	Draft Policy R1 is overly prescriptive, lacks flexibility, and lacks a tested, evidence-based exemption process which risks deterring investment key employment sectors. Example given relates to proposed 20 kWh/m ² /yr cap on space heating and the blanket ban on fossil fuels - Lab buildings often have unavoidable high energy use due to mechanical ventilation, pressurisation systems, and internal environmental controls.	The policy sets key energy performance standards but allows for flexibility in how these are achieved – e.g. not being prescriptive about technologies. There are also mechanisms in the policy which set out what applicants should do if any requirement can be shown to be not feasible.
R1	Policy is not supported by evidence	Policy is not underpinned by sufficient evidence.	The policy draws on a range of evidence that supports the technical feasibility of delivering net zero (and the situations where it is more of a challenge) that has been produced across
			the country from a variety of comparable local authority areas. This is summarised in the Literature Review. The policy is also supported by the range of analysis set out in the net zero carbon background paper.

R1	Policy creates substantial uncertainty for complex science and innovation facilities	Policy creates substantial uncertainty for complex science and innovation facilities. Requiring 100% on-site energy generation is unrealistic for R&D campuses (due to have high energy loads and limited roof or land space for renewables).	As covered earlier, where onsite renewable energy generation to meet energy demand is not achievable, there are other options allowed for in the policy.
R1	Policy could have various negative impacts for design and expense.	Requirements could distort site design, waste land, or necessitate expensive, inefficient infrastructure.	We have set the policy to be as flexible as policy to enable variations in site context and needs of different proposals whilst still requiring key performance standards to demonstrate net zero in operation.
R1	National policy does not support need for full selfsufficiency.	National policy supports low-carbon design and energy hierarchy principles, not full self-sufficiency.	The city has a local net zero target of 2040 and the national requirement is 2050. The policy sets requirements which will help to ensure that new development that will exist beyond both of these dates would not require extensive retro-fit in future. It will also help to address other challenges like air pollution, energy security and fuel poverty.

R1	Lack of published viability testing	Viability of these requirements have not been tested through a published viability assessment. When coupled with other policies, it risks pushing R&D schemes beyond deliverable limits.	The whole plan viability testing will be published at the next stage of consultation. The development of the policy is informed by viability testing alongside other policies in the Local Plan.

R1	Policy should do more regarding heat networks	Policy is limited in what it says about heat networks. Words like ‘consider’ are too easy to ignore. Central government policy (DESNZ) is strongly towards the delivery of heat networks in urban areas and Local Plan should be a catalyst. It is suspected that connected to a heat network will be cheaper than other solutions. It is recommended that the Policy be strengthened by mandating connection or, failing that, mandating a business case to be undertaken with an existing HN operator to demonstrate that a connection is not viable. Wording should state that it is an “<i>expectation</i>” or “<i>requirement</i>” to connect where networks are available and have capacity. Also, limited acknowledgement or support given to assist overcoming challenges to the development of heat networks in Oxford i.e., extensive heritage assets and rivers	The policy sets out a framework of performance standards for ensuring new buildings are net zero in operation. There can be a variety of technological solutions that would enable the various criteria to be met. The Local Plan continues the approach of the adopted Local Plan in not explicitly favouring any one technology – so as to allow the most sustainable solution to come forward for each site, depending on its context. This also allows for future-proofing of the policy where new or improved technological solutions become available. We are aware that heat networks can be seen as playing an important role in certain contexts and have explicitly flagged this as a consideration in the policy – however, we would maintain that

			flexibility should be retained for applicants to pursue the most sustainable option for the proposed development. We would be open to exploring how further support for applicants pursuing heat network connection could be expanded upon in supporting guidance for the policy such as the intended Technical Advice Note that is envisaged.
R1	Connecting to existing energy networks as an alternative to onsite generation.	Alongside on-site generation of renewable energy, policy should give equal weight to connections to existing renewable / LZC energy technologies (e.g., district heat networks) to fulfil heating requirements of developments. As currently worded, could discourage developers from connecting existing networks. Additional wording suggested to add to the energy hierarchy requirement – allowing connection to offsite heat source alongside onsite renewables.	As set out above, we acknowledge that there can be a variety of technological solutions that would enable the various criteria to be met – this could include connection into a heat network where available. We disagree that the wording would discourage applicants from pursuing this option where it is the most fitting solution for their site and for meeting the policy requirements.

R1	More clarity needed on types of applications policy applies/does not apply to	Policy sets out requirements for additional deliverables/ supporting energy-related information for all new development but does not distinguish between different types of development (and their nuances). E.g. Policy sets out that the Council would expect this information to support planning applications for renewable / LZC developments, (despite it being irrelevant to such developments). Should seek to introduce policy wording/ supporting text to confirm that this would not apply to renewable / net zero carbon technology development (such as energy centres/ infrastructure associated with district heat networks and other renewable energy development).	The starting point of the policy is that all new buildings should be net zero carbon in operation. It is acknowledged that various types of development will have their own nuances and requirements. The policy sets out what is expected of proposals where compliance with the requirements is not possible and allows for applicants to justify this.

R1	Policy should address need for Energy Centres.	Neither the Policy nor the Local Plan makes reference to energy centres which are fundamental to developing heat networks. The plan does not allocate any sites for energy centres and is unsupportive and restrictive planning policy context for any planning applications. Applicants would need to overcome any policy designations / allocations on otherwise suitable sites to make development permissible. Energy centres are key to net zero carbon goals and can bring wider positive benefits e.g. jobs, public health. Additional wording suggested including that low carbon energy centres be supported alongside development of heat networks; that Council will work proactively with developers to overcome constraints like heritage, infrastructure and crossing water; that Council will expect developers to connect to a network where is has sufficient heat/capacity; and that where applicants propose not to connect they provide robust justification.	We agree it would be helpful to also flag support of energy centres alongside general heat network development and will amend the policy as such. However, an allocation in the Local Plan is not considered necessary to allow the development of an energy centre to come forward in a suitable location in the city. An allocation would also not negate any additional policy considerations in the Local Plan that development would need to comply with where these are of relevance to developing in a certain location.
			See previous responses which address other elements of these comments.

R1	<u>Suggested Energy Centre Site Allocations</u>	Whilst aware of the development constraints within the Oxford, have identified two suitable sites for an energy centre that would minimise impacts on heritage / Green Belt / other environmental considerations. Propose that Council removes/ reduces GI protection and allocates for energy centre: • Former Hinksey Campsite – part of core GI network but considered to have limited scale/ quality of GI on site and not of significant ecological value. Site is no longer in use as a campsite and no longer confers social benefit. • Park Farm - currently allocated for residential development thus principle of development is accepted. Allocation now being removed indicates site is not needed for housing. Site is not publicly accessible, limited in green features and has minimal opportunity for biodiversity – thus unclear why it has supporting status in the Green Infrastructure. Securing site allocations to allow energy centres to come forward will enable the benefits of the proposed network to be realised. A future network would ultimately require multiple energy centres to power the network in future phases, thus both are needed as allocations.	As set out above, a specific allocation in the Local Plan is not considered necessary to allow the development of an energy centre to come forward in a suitable location in the city. The Local Plan has sought to identify sites for designation within the Green Infrastructure Network (as either core or supporting spaces) where they meet particular criteria regardless of location. Where a site may be identified as beneficial for another use, this would not negate the considerations regarding its identified green infrastructure value.
R1	More guidance/support needed for sports facilities	Sport England is concerned that new or upgraded community facilities may not be delivered, or old community buildings may be retained that cannot meet current standards for accessibility. Sports facilities will face different challenges to other sectors when seeking to make their facilities more sustainable. Important that the Plan considers including policies that operators of these facilities can	We appreciate that there will be various nuances and challenges for each type of development. The policy includes varying targets for some different types of development as well as

		navigate. Could the Local Plan point to our guidance on delivering sustainable sports facilities and flood prevention?	mechanisms that can be followed where particular site/proposal specific constraints will make certain requirements challenging. There are limits to how far we can diversify the policy to meet every different type of application however. We intend to produce an updated Technical Advice Note which provides additional guidance in meeting the requirements of policy R1 and this could be a place where we can link to more specific guidance for particular types of application.
R1	No mention of community owned energy/local energy hubs	No mention of “community owned energy hubs” or “local energy hubs” - which should be far more common features of any large application. With reference to the success of Low Carbon Hub projects in Oxford City Centre, there could be more emphasis on locally generated and owned energy hubs, as an inherent part of the design.	We will incorporate reference to these within the supporting text of the policy.

R1	No mention of cooling	There are multiple details about heating methods but no mention of air-conditioning or cooling systems. Although we are aware that a/c would increase energy use - the use of cooling systems would be used at a time of increased/excess solar energy (and when there is less need for heating) We are concerned that if city overheating is not mentioned and the option of a/c and/or planting large trees near buildings (prioritising care homes, hospitals, schools and nurseries) is ignored, then the future of health and wellbeing could be at risk.	Pursuing high fabric efficiency, in line with designing in accordance with the energy hierarchy, should have equal benefits for keeping the building cool in summer as it does warm in winter. However, we agree that addressing overheating will be an increasing issue, and separate policy G9's resilient design requirements
			specifically set out that applicants need to thinking about this issue (criteria a and b) – including having a cooling strategy.
R1	Supplementary guidance should be produced.	Supplementary guidance should also be given to developers on how to meet the targets, including changing plans, such as position/direction of solar panels.	Agreed – the design checklist (in appendix) touches on various aspects of net zero design and should support applicant's in approaching their design. Equally, we intend to produce an updated Technical Advice Note which provides additional guidance in meeting the requirements of policy R1.

Statutory Consultee Responses – Draft Policy R1

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

2343

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R1 Net Zero Buildings in operation	Climate Action We are strongly in favour of the preferred option for this policy, and support the inclusion of regulated and unregulated energy in the net zero carbon mandate. Consideration should	Noted. We will consider setting a separate lower EUI target for schools compared to other non-residential uses.	Oxford City Action: Consider proposed wording going forward.

	be given to setting a separate, lower EUI target for schools, compared to other non-residential uses. We support the reference to heat networks and the need to consider connections at design stage where relevant. Consideration should be given to the solar orientation of new buildings and developments at design stage to maximise solar capture and ensure thermal comfort. The policy should specify a preference for onsite offsetting of residual emissions through naturebased solutions which also provide other adaptation-related benefits such as shade, cooling, and flood risk management.	Noted. Consideration is given to orientation and solar gain in policy HD11: <i>Privacy, Daylight and sunlight</i>, Policy HD13: <i>Outdoor amenity space</i>. The Design Checklist – Appendix 1.1 also discusses building orientation to maximise solar gain, glazing design to ensure thermal comfort. We can consider whether “on-site offsetting” would work in a constrained city such as Oxford.	No Action Required No Action Required Oxford City Action: Consider proposed wording going forward.
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

	This policy should require proposals for redevelopment of a building to improve the energy efficiency of the building and consider retrofit measures which could be undertaken alongside the proposed works. Proposals which significantly improve energy efficiency should be supported.	Policy R1 already sets out that proposals for conversions and changes of use. Policy R3 supports retrofit of existing buildings and expects the energy hierarchy to be followed.	No Action Required

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy R1	Part 2 of draft Policy R1 should be more specific and refer to limiting unregulated energy demands only, whilst still including a regulated total energy cap set by supporting evidence. Regulated energy is easier to limit than unregulated energy in these cases, so providing a regulated energy cap would allow for carbon emissions to be reduced whilst allowing flexibility for applicants. Support the aims but more evidence than the literature review is required, including viability, energy modelling. Part 3 regarding EUI is inaccurate. The wording 'the portion of the development's total EUI associated with space heating is no more than 20kwh/m2/yr should be reworded to ensure it accurately reflects the space heat demand metric.	We concur that the requirement in criterion 3 could be worded more clearly and will amend this for the Reg 19 draft of the policy. Regarding criterion 2, we disagree that the policy should only refer to limiting unregulated energy demands and the EUI target applies to total energy (regulated and unregulated). We envisage that the supporting technical advice note can incorporate additional guidance on how we expect applicants to justify where a higher EUI is	Reg 19 draft R1 wording for criterion 3 will be updated in relation to space heating demand. R1 supporting text will flag the preference for net zero carbon heat sources in heat networks.

	Space heat demand is the amount of heat needed to keep the building at a comfortable temperature, regardless of how that heat is delivered, whereas EUI reflects the actual energy use at the meter. All industry frameworks recommend using actual space heat demand as the metric. Should change 'EUI associated with space heating' to 'space heat demand'. Recommend undertaking feasibility work to determine EUI requirements by building type, to assess whether they can be more ambitious where technically feasible. We recommend that Policy R1 states that heat networks should be powered from zero emission sources	needed and this could potentially include steps taken to reduce regulated and unregulated loads in turn. We agree that additional evidence is required in relation to viability, and will of course be viability testing the policy alongside the other policies of the Local Plan. However, we disagree in relation to energy modelling. The intention of the literature review was to set out the ever-increasing cumulative evidence base that justifies similar policies emerging/adopted across the country. This focusses on local authority areas whose evidence examines locally applicable building typologies to what could be expected to come forward in Oxford. These all generally show that net zero carbon development is <i>technically feasible</i> for types of development we expect to come forward under the new Local Plan.	

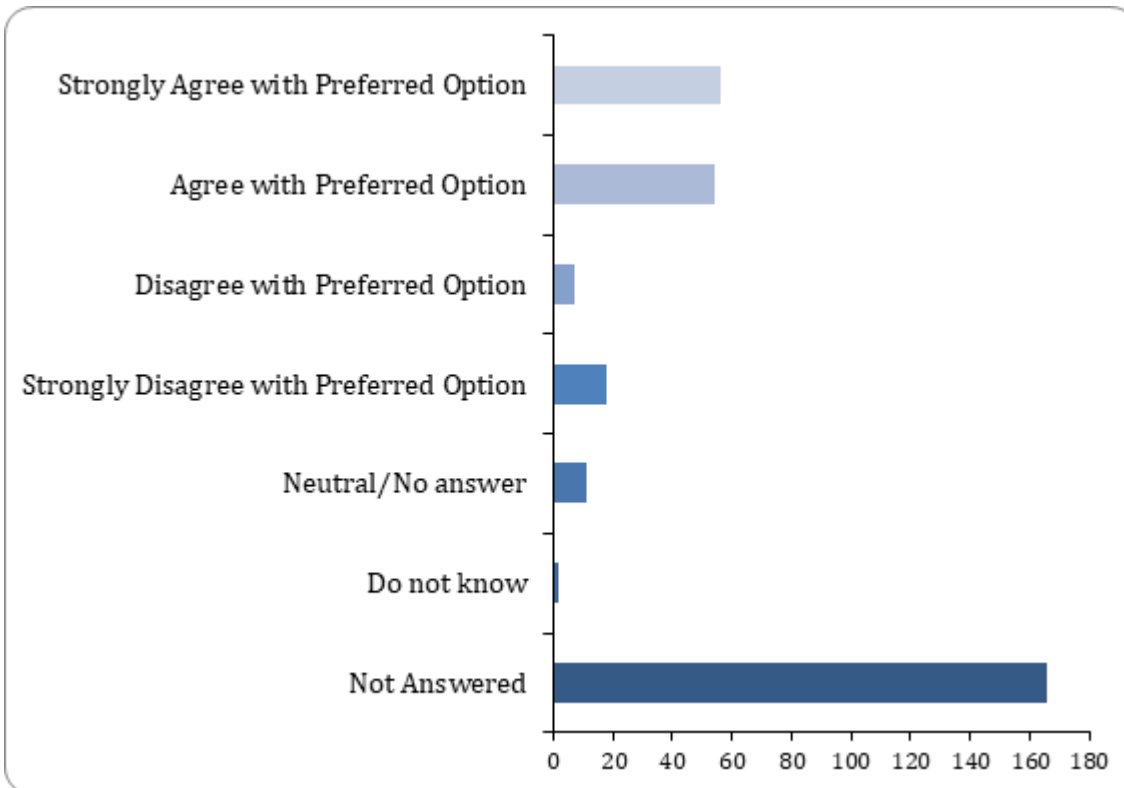
		We agree that heat networks being powered from net zero	

		sources should be the preference in the first instance and this should be highlighted in supporting text. However, we are unsure whether low carbon sourced networks with a clear pathway to net zero in future should be firmly ruled out, particularly if other sustainability considerations apply.	

All Public Responses – Draft Policy R2

Please tell us what you think about policy options set 008b (draft policy R2): Embodied Carbon. If you have any additional comments please put them in the comment box.

There were 148 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	56	17.83%
Agree with Preferred Option	54	17.20%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	18	5.73%
Neutral/No answer	11	3.50%
Do not know	2	0.64%

Not Answered	166	52.87%

30

All Public Responses – Draft Policy R2

R2	Preferred option	Support for different options in consultation e.g. some flagged support for alternative option 1, whilst others supported option 2.	Noted
R2	BBOWT	BBOWT strongly agree with preferred option.	Support welcomed.
R2	Welcome the proposed policy	Various comments flagging support. Comments included that applications that seek to limit embodied carbon should be considered favourably, as well as where a fabric-first approach taken. Other comments included that policy is overdue and would bring in line with RIBA recommendations, or that it would address concerns about embodied carbon impacts of previous buildings in city being knocked down and replaced. Also, that the principle of this policy helps meet Net Zero objectives.	Noted and support is welcomed.
R2	Support principle of asking applicants to consider impacts and take actions.	Supportive of the principle that developments are expected to demonstrate consideration of embodied carbon in the construction process and take actions to limit this as much as possible through careful design choices.	Noted and support is welcomed.
R2	Mixed support and concern	Some comments welcomed the flexibility of the policy not having targets. Others felt that the policy is too rigid. Lacks clarity and that more flexibility is needed particularly for the science and innovation sector. Also some concern about onerous requirements but also support a quantitative approach.	The range of comments reflects the complexity of this topic. See responses below which respond to these issues raised.

2352

R2	Policy should go further – explicit targets needed.	Some felt that the Council should take stronger position on sustainable development including embodied carbon in light of the current climate crisis. Some felt that the policy should include specific requirements for major development measuring embodied carbon during construction through a recognised methodology. Others have specific targets e.g. South Gloucs - 625kgCO2e/m2 for residential of four storeys or less, to 970kgCO2e/m2 for major nonresidential schemes	As the consultation set out, the topic of embodied carbon is incredibly complex, and still subject to evolving learning and guidance. The policy is intended as a stepping stone to potentially stronger requirements in future as understanding and approaches
			to reducing it improve. It takes requirements further than the currently adopted Local Plan by seeking to ensure applicants consider the issue of embodied carbon appropriately based on the scale of their development and demonstrate how they have sought to reduce it.

R2	Policy should be removed, current barriers are too extensive.	Aecom, research highlights issues with the lack consistency in reporting on carbon assessment outputs, the quality of carbon assessments, large gaps in the availability of both product specific environmental product declarations (EPDs) and generic data, the variation in product carbon results for similar building products, and lack of consistency across carbon tools. Also highlights issues with the uptake of lower embodied carbon materials and products due to costs, risks and insurance, the need to upskill the industry and access to carbon tools. The challenges have not been addressed yet and are not likely to be addressed in the short term. Without consistent data and information, almost impossible for applicants to provide decision makers with reliable information on which to base a decision. Policy should be deleted.	Whilst understanding is still evolving, the policy is considered to be a flexible and pragmatic response to the need to take actions to limit embodied carbon wherever possible without setting strict targets (for the reasons set out in previous response above). As buildings become net zero in operation, embodied carbon in construction will become the primary source of emissions and this needs to be considered.
R2	National standards will ultimately address embodied carbon – no need for local ones	National standards already moving towards a unified approach (draft Part Z) – setting local standards risks double-regulation and overcomplicates approach with various potential consequences. Oxford should let forthcoming national standards handle the complex, rapidly standardising field of embodied-carbon measurement.	This is not certain – the policy wording includes flexibility to defer to national standards where they arise in future.
R2	No policy needed	No local policy needed – no further reason given.	Comment noted

R2	Demolition is a last resort	Policy should explicitly set out that demolition is a last resort, especially when a building has not exceeded its expected useful life. Another suggestion was for the policy requirement to be more strongly worded: “prioritise the renovation or retrofit of existing structures, as part of an efficient use of resources and minimising carbon emissions”	Comment noted – the policy sets out expectations for applicants to show they have considered whether reuse is feasible.

R2	Variety of concerns with criterion a (explore reuse of buildings before demolition)	Various concerns related to criterion a of the policy and the requirement to explore reuse before resorting to demolition including: - That feasibility of retaining existing buildings does not just relate to technical considerations such as structural limitations or operational requirements. - That the requirement ignores longer term sustainability benefits of replacing some buildings (e.g. where they are inefficient) which may outweigh carbon cost that come from demolition and that may derive larger carbon savings in the future, along with wider social and economic benefits - That is unclear how the Council will assess the feasibility of re-use vs demolition. - That this is an open-ended policy test which leaves the final assessment down to the judgement of the decision-maker at the end of the process, reducing certainty for applicants. - That national policy does not strictly prohibit demolition, nor does it suggest that carbon saving policies should be prioritised over the growth of the economy and innovation. - That the requirement stifles potential for innovation.	The policy is not intended to rule out demolition entirely, or to force applicants to retain all existing buildings. We agree there can indeed be good reasons for replacing existing buildings. The policy simply seeks to introduce a requirement that applicants begin the design process of their site by exploring potential for reuse of existing buildings and robustly demonstrating through their application that this has been determined to be unfeasible before resorting to demolition (explaining why). We have incorporated wording into the supporting text to the policy which expands on criteria a and acknowledges that replacement of buildings can have benefits which override their retention for a variety of reasons.

R2	Support in principle – More focus on whole life carbon testing	Whilst supporting the approach to exploring reuse of buildings in principle, but flagging similar concerns to the above, one comment set out that the Council should place greater emphasis on whole life carbon testing to ensure that operational carbon of existing buildings is factored and that buildings constructed have a longer life span and are capable of flexibility rather than constructing a low embodied carbon building now which is no longer fit for purpose in future years.	Applicants need to set out in their Energy and Carbon Statement how the principles in the policy are embedded in design choices. There may be justifiable reasons why particular design choices need to be made which diverge from some of the principles and this will be for the applicant to explain through their statement. Whole life carbon testing could be one means of justifying a particular design choice, but we have not mandated this as a requirement in showing how the principles have been responded to. We have incorporated some wording into supporting text to help clarify this.

R2	Support in principle – more focus on comprehensive redevelopment approach	Another comment in relation to the approach of criterion a was that the policy should support a comprehensive redevelopment approach where planning and place making benefits outweigh those achievable through the limitations/constraints imposed by reuse of existing buildings. A supporting paragraph should be introduced to go alongside part a) to reference that any such assessment of part a) is proportionate to the assets being reviewed and in the context of other planning policies, such as those which promote transformational change and encourage redevelopment to deliver optimum outcomes. This would ensure that brownfield sites with existing buildings and those allocated for redevelopment in the Local Plan are optimised where a	As per response earlier, we have made sure to incorporate some wording in the supporting text that responds to this point.
		retention approach renders development undeliverable. This would particularly be the case for the Templars Square site.	
R2	Impacts on need for intensifying employment sites should be considered	Oxford is seeking to intensify existing employment sites and there may be an existing building on a site that would not be suitable for the proposed employment use and would not result in making the best and most efficient use of brownfield land. It is therefore proposed that the following wording in bold is added to part a): “Re-use of any existing buildings on a site has been robustly explored and demonstrated to be unfeasible, or where it is not making the most efficient use of brownfield land, before resorting to demolition”	As per response earlier, the wording we have incorporated into the supporting text to the policy expands on criteria a and acknowledges that replacement of buildings can have benefits which override their retention for a variety of reasons.

R2	Policy should be “retrofit/refurbishment-first” not retrofit/refurbishment <i>only</i>	Policy R2 should be a “retrofit/refurbishment-first” policy, not a “retrofit/refurbishment <i>only</i> ” policy. Partially addressed in criteria (a), however the wording highlighting the potential benefits of replacing buildings should be included.	The policy is not intended to be a “retrofit/refurbishment <i>only</i> ” policy. See earlier response.
R2	Concern justification of demolition will be too easy	Support principle that repurposing existing buildings should be default before looking to demolish. Concern that Council will be swayed by expensive reports that too easily justify demolition.	Comment noted.
R2	Additional guidance for the TAN	Suggest including text in future technical advice note on the re-use of existing buildings being dependent on whether they are suited to the requirements of the site.	See earlier response, we have added wording as part of supporting text which addresses this issue.
R2	Some elements of policy should be conditioned, not required up front.	At planning application stage, it is not always possible to define with any certainty the source of materials. This is not known until a contractor is appointed, after planning permission has been granted. As such certain elements of this policy should be conditioned and should not be required up front.	Comment noted
R2	Additional evidence needed to support applications	The policy introduces the need for complex Energy and Carbon Statements including Whole Life Carbon Assessments as well as	The draft Local Plan seeks to ensure that applicants’ evidence for demonstrating how the
		quantitative measures for reducing embodied carbon, amongst various other additional reports through the new LP. Government has wider ambition to streamline the planning system and additional requests for information through local	requirements of policies R1-R3 are met, is submitted as part of an Energy and Carbon statement. This is to ensure a

		policy in support of planning applications should be examined carefully.	consistent way of collating this information across applications
R2	Support proposed threshold for Whole Life Carbon Assessments	Support only requiring submission of Whole Life Cycle Carbon Assessments for larger applications (developments of 100 or more dwellings, or 10,000m2 or more non-residential floorspace). This will enable flexibility for future development in the city which will ensure embodied carbon principles are incorporated without adding unduly high burdens on small developments.	Support noted.
R2	Object to requirement for Whole Life Cycle Carbon Assessment.	Embodied-carbon auditing is technically demanding, data-poor, and still evolving. Forcing every major scheme to commission a WholeLife-Cycle Carbon Assessment and negotiate bespoke reduction measures will lengthen pre-construction phases, raise consultant fees and tilt marginal brownfield projects into non-viability – ultimately impacting pipeline of needed development.	Comment noted, the draft policy requires only the largest scale developments to undertake WLCCA – rather than every major development.
R2	Whole Life Carbon Assessments for all development	Whole Life Carbon Assessment should apply to development at all scales. Given the sustainable development goals within this plan and the national targets it is important to understand the embodied carbon implications of all development.	Comment noted. It is important the policies are proportionate, justified and achievable, which the policy as written is considered to be.

R2	Object to lack of detail regarding Whole Life Cycle Carbon Assessment requirements	Policy requires Whole Life Carbon Assessments (WLCAs) for largescale new-build development but does not specify: - The required methodology; - The system boundaries (e.g. whether lab fit-out, site-wide infrastructure or external plant are included); - Baselines or benchmarks by building type or use class; - Measurable reduction targets.	The policy does not set targets that should be met in terms of overall embodied carbon or how much reduction should be secured through design process for the reasoning as set out in response to earlier comments above. It is for the applicant to
		Lack of detail prevents meaningful engagement during design/ planning process & creates risk of subjective/ inconsistent decisionmaking.	set out how far they have limited embodied carbon in line with the spirit of the policy and within the existing constraints and specific requirements of their particular proposal. In terms of required methodology, including the specifics of what a WLCCA should cover, this would be expanded on in a technical advice note, which can more easily be kept up-to-date to reflect evolving best practice and understanding.

R2	Enforcing requirements of policy	Compliance should be strictly enforced with sanctions for noncompliance. If applications do not adhere to the specific targets set, then applications should be sent further guidelines, and if not followed, should be refused. No point in allowing plans to “demonstrate a robust feasibility survey” and then allowing to exceed carbon targets.	Whilst we appreciate desire for targets, and have responded above on this point, we do not currently see a way to introduce these and assess in a consistent way. Applicants would need to submit an energy and carbon statement detailing how they have met the policy requirements and the permission would be granted subject to a condition that the development is built in accordance with submitted documents. Were an applicant to fail to build in accordance with
			the condition they could be subject to enforcement action.

R2	Objection – policy not clear	This policy is not effective. It is not clear whether it applies to buildings in Conservation Areas (Designated Heritage Assets)	The draft policy clearly sets out that the first part (the principles set out in criteria a-e) applies to all development, and the second part (criteria f and g) applies to large scale new-build development that meets the size thresholds. It would apply to development within conservation areas or outside of them where they meet the above conditions – though of course other policies would also need to be considered (e.g. HD1 Conservation Areas).
R2	Clarification needed	Council should clarify what it means by major development.	The term major development is as defined in the town and Country Planning legislation.

R2	Objection – specialist buildings not considered	Policy doesn't consider specialist nature of lab/ R&D buildings. These buildings often require bespoke, heavily serviced structures that may limit opportunities for material reuse/ application of low-carbon alternatives. Blanket requirement for reuse/ prescriptive performance thresholds risks undermining building safety, functionality, or future adaptability.	Criteria a-e are not rigid in their requirements, they set out particular principles in the design/construction process which need to be considered. Generally, operational requirements of a proposed development will be able to be factored into how they are responded to. E.g. in terms of criteria b – it does not explicitly ask for all materials to be reused,
			or for no waste to be generated – it asks for the Energy and Carbon statement to show that waste has been minimised and reuse of materials maximised, and of course, particular needs of a building's design and construction will influence how far these asks can be demonstrated.

R2	Objection – not viability tested	Concerns about policy increasing cost of development, and that the cumulative burden with other policies has not tested through Viability assessment. Additional assessment, reporting and material specification costs all add pressure to schemes that already face tight margins due to lab specification, planning obligations, and land values.	The whole plan viability testing will be published at the next stage of consultation. The development of the policy is informed by viability testing alongside other policies in the Local Plan.
R2	TAN should be published before Reg 19 to inform comments	The Council intends to produce a TAN - this must be issued before/ at Regulation 19 for informed comment.	Technical Advice Notes are intended to aid applicants and provide additional support/guidance in meeting the policy requirements. It is not necessary for informing comments on the requirements of the policy itself.
R2	General comment	It is possible to carbon cost the Local Plan as it develops and site details develop?	Unfortunately, without being able to predict the finer detail of how each new development brought forward across the plan period would be designed – e.g. specifics of site layout, materials

			used, processes of construction – any quantitative carbon estimate would be subject to significant uncertainties. The Sustainability Appraisal does seek to consider the impacts of the Local Plan against carbon emissions at a very high-level and in a more qualitative way, as it this is one of the 12 SA objectives. The assessment draws out the importance of including policies like R1 and R2 in mitigating carbon impacts as much as possible.

Statutory Consultee Responses – Draft

Policy R2

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy R2	Minerals and Waste Policy & Strategy		
Embodied Carbon	Odd choice to use the phrase 'from cradle to grave' when referencing whole life carbon cycle – in a truly circular economy there should be no 'grave', suggest using 'lifetime of the development' as an alternative phrase.	Noted. We can consider an alternative phrase for the next draft of the plan.	Oxford City Action: Consider proposed wording going forward.

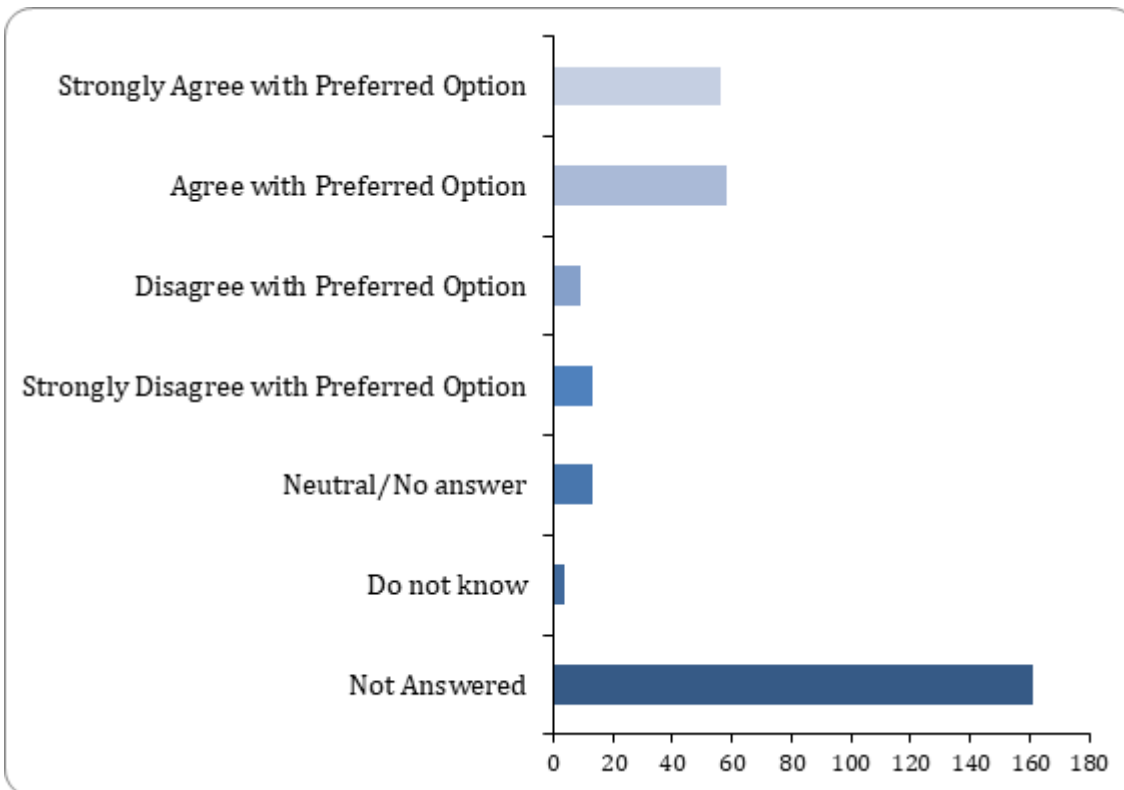
	Welcome point b in Policy R2 – minimisation of waste generation, and re-use and recycling of materials. Climate Action We suggest referring to the use of nationally recognised tools in order to produce a relatively standard response for Lifecycle Assessments which will be easier for officers to assess (e.g. OneClick LCA). Innovation We are pleased to see the inclusion and emphasis on embedded carbon and the innovative choice of alternative materials that this focus can lead to. One such is the increased use of timber in construction. This also has the potential of reducing the quantity of concrete in foundations as wooden structures can be lighter than traditional build.	Noted. We can consider whether it is appropriate to recommend a particular Life Cycle Assessment within the Plan or whether this issue would be better explored within a Technical Advice Note. Noted.	No Action Required Oxford City Action: Consider proposed wording going forward. No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R2	Welcome policy and encourage supporting text to make explicit the link to heritage conservation. Building re-use has the potential to contribute to the Council's positive strategy for the historic environment.	Support welcomed	N/A

All Public Responses – Draft Policy R3

Please let us know what you think about Policy Option Set 008c (draft policy R3): Retrofitting existing buildings including heritage assets. If you have any additional comments please put them in the comment box.

There were 153 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	56	17.83%
Agree with Preferred Option	58	18.47%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	13	4.14%
Neutral/No answer	13	4.14%
Do not know	4	1.27%
Not Answered	161	51.27%

Draft policy	Topic	Summary of comments	Response
R3	Preferred option	Support for different options in consultation e.g. some flagged support for alternative option 1, whilst others supported option 2.	
R3	BBOWT	BBOWT strongly agree with preferred option.	Support welcomed.
R3	Support for policy	Support for the Preferred option, including: the positive approach set out in the Policy in terms of retrofitting; the emphasis on a “whole building” approach; that it does not set out targets or introduce specific measures; the acknowledgement that historic buildings and heritage assets are more sensitive to change; the more nuanced approach to the retrofit of heritage assets/buildings/conservation areas.	Support welcomed.
R3	Support balancing temporary harm versus long term benefit.	Support balancing of ‘temporary harm’ vs ‘long term benefit’ and other trade-offs that prioritize climate resilience and our collective ambitions to reach net zero - against-aesthetic/heritage considerations.	Comments noted.
R3	Support retro-fit over demolition	Some comments agreeing with the need for retrofit before exploring demolition and that there are examples in the city where buildings have been demolished instead of repurposed.	Comments noted.
R3	Retro-fit of existing buildings will help cut emissions faster	A presumption in favour of fabric upgrades, heat-pump installation and solar PV on non-designated buildings will cut emissions faster than efforts to achieve net zero new-build.	Comment noted.
R3	Carbon-saving measures as a public benefit	Counting carbon-saving measures as a public benefit in Listed Building or Conservation-Area cases gives owners a clear,	Comment noted.

		workable path to decarbonise landmark stock without endless bespoke arguments.	
R3	Policy should go further – helping	Should go even further in encouraging historic buildings to be modernised in energy efficient ways. This might mean helping building owners to work with English Heritage to find compromises	The Local Plan policy is one tool in supporting applicants to drive retro-fit of existing buildings.

Draft policy	Topic	Summary of comments	Response
	occupants to access grants	that respect conservation goals and sustainability goals. Given how many historic buildings, Oxford has and in such a small footprint, it seems like we ought to be able to show leadership on this.	Agree that other ways to support building owners is important although this generally falls outside of the scope of the Local Plan preparation itself. Where possible we could look at how we can incorporate additional helpful guidance of relevance into our supporting technical advice note, which will need to be updated for the new Local Plan's adoption.

R3	Refuse applications which don't comply	If applications do not show compliance with the policy, then applications should be refused.	Accordance with the policy requirements will be a material consideration in the process of determining planning permission for relevant applications, as with other applicable policies in the Local Plan.
R3	If retro-fit not feasible, this should be justified by applicant	Applications proposing retrofit of buildings should be considered favourably. Where retrofitting is not feasible / viable, then applicants should seek to provide adequate justification.	The policy cannot force applicants to retro-fit or to justify why they cannot, it provides a framework for how applicable applications should approach their retro-fit projects when they come forward seeking planning permission to do so.
R3	Flexibility needed	Policy should be flexible. Also common sense is needed in application of policy. Other flagged that it may not be realistic to make retrofitting compulsory. Instead, encouraging new	Agree that flexibility is important so that each project can be designed in the most suitable

Draft policy	Topic	Summary of comments	Response

		development or refurbishing sites to take up alternative new energy and other to reduce carbon emission may be more realistic.	way for its particular context. The policy does not set rigid targets, or explicit requirements in terms of type of retro-fit that should be undertaken. Instead, it sets the framework for how to approach design of the project, including promoting a whole building approach which helps to ensure that retro-fit measures are selected which most suit the building.
R3	Concern about heritage impacts from retro-fit	Concern that policy will allow historic buildings to receive ugly external changes in order to achieve carbon reduction and undermine conservation principles.	The purpose of asking applicants to take a whole building approach to the retrofitting of traditional buildings, including heritage assets, is precisely to avoid this kind of impact (amongst other reasons). The approach means ensuring that a proposal is informed by a thorough understanding of the building, including the particular characteristics/qualities for which it might be protected, and then ensuring that design of retro-fit measures factors these qualities in.

Draft policy	Topic	Summary of comments	Response
R3	No policy wanted	Council should not interfere. There should be no policy for this topic.	Comment noted. The policy is intended to help support applicants who wish to pursue retro-fit so that they can approach these projects in the most appropriate way and avoid harmful impacts, which will enable them to be better placed to navigate the planning process.
R3	Policy is too expensive and waste of money	Concern about who will pay for the retro-fitting and that householders will be forced to retro-fit. Concern about expense generally not being justified and that policy is a waste of money that is paid for by tax payers.	The policy does not force anyone to undertake retro-fitting. Other than costs that might be associated with meeting the requirements of the policy for the applicant undertaking such a project, the policy does not directly impose costs on others in the city.

R3	Need for retro-fit may only be temporary	Heritage needs to be preserved beyond the current climate crisis. Future technical advances that may later negate the need for retrofitting.	Comment noted, however, we are unable to prepare policies based upon uncertain or unforeseen future technical advances. The policy responds to an existing need to support owners of current buildings who wish to pursue retro-fitting projects. As set out in earlier responses, the policy is intended to help ensure retro-fit projects

Draft policy	Topic	Summary of comments	Response
			that require planning permission happen in the most appropriate way whilst balancing out our responsibilities towards protecting the historic environment.

R3	Connecting to heat networks	Should also strongly encourage connection to heat networks as these (particularly where designed to operate at higher temperatures than building-level heat pumps) provide a way of decarbonising hard to treat (listed) buildings with minimal impact on their existing fabric/heritage assets. The vast majority of emissions in 2040 and 2050 will be from buildings that already exist - encouraging/mandating connections to these when retrofitting should be a key lever in the City achieving this.	Comment noted – there could be a variety of ways to secure the most sustainable outcomes from a retro-fit project including connecting to/using heat networks/heat pumps. The policy does not rigidly require applicants to utilise any one particular technology, as the best solution may differ depending on context of the building and the wider site. Equally, technology is continually evolving and it is important that the policy approach is future-proofed as best as possible. The policy sets the framework for how to approach design of the project, including promoting a whole building approach which helps to ensure that retro-fit measures are selected which most suit the building.

Draft policy	Topic	Summary of comments	Response

R3		Give more explicit encouragement to carbon-reduction technologies with an externally visible aspect -- e.g. solar panels and heat pump external units -- by encouraging their use including in publicly visible locations in more circumstances. Still seeing advice issued that solar panels should be reduced to produce a 'balanced' roof, the implication being that panels are an aesthetic negative compared to roof tile, and that this aesthetic is important enough that we should accept increased emissions. Proximity to a heritage asset is also being cited as a reason to remove or minimise use of solar panels. We should constrain ourselves to only restricting solar directly upon a heritage asset or in very close proximity to a highly sensitive asset.	
R3	Retro-fit against overheating	Retro fitting is important and needs to include resilience against heat.	Agreed, this is why the policy talks about retrofit measures that go beyond just energy efficiency. It highlights that the Council will support retrofit measures to existing buildings where they secure energy efficiency improvements or adaptation to changing climate. Resilience to overheating/higher summer temperatures is an important facet of adaptation to climate change.
R3	Homeowners need support	Comments about need for need expert assistance and/or funding (e.g. grants) to support people to achieve this objective.	Criterion c of the policy talks about the need for obtaining professional expertise where necessary/appropriate. The

Draft policy	Topic	Summary of comments	Response
			accompanying Technical Advice Note (TAN) will be able to point applicants to further guidance/support to some degree, as is the case in the existing retro-fitting TAN.

Statutory Consultee Responses – Draft Policy R3

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

2379

Policy R3	Climate Action		
Retro-fitting existing buildings	The reference to the adaptation benefits of retrofit is welcomed. Reference should be made to the need to maximise reuse and retaining of materials where possible during retrofit in order to reduce the embodied carbon of the proposal.	Noted. We can consider whether to include this reference in the Reg. 19 plan. Reuse and retention of materials is already covered within Policy R2.	No Action Required Oxford City Action: Consider proposed wording going forward. Oxford City Action:

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

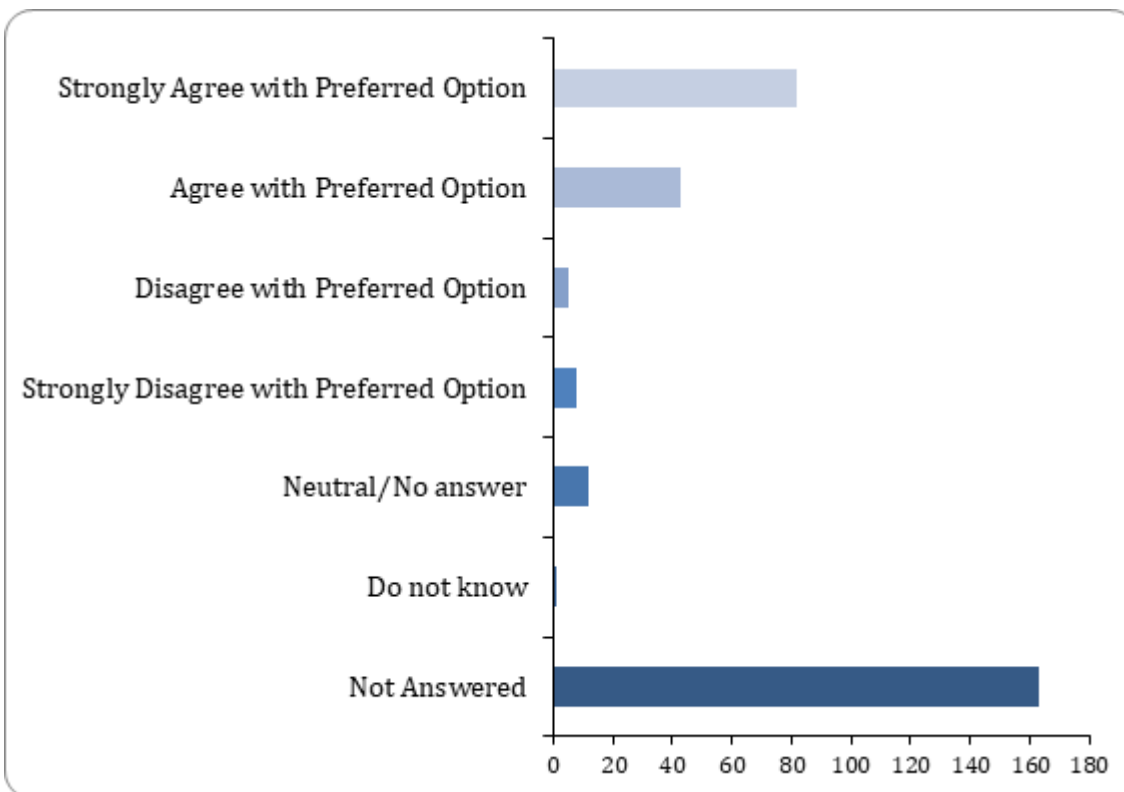
	Suggest inclusion of a statement about postimplementation monitoring e.g., <i>The Council may request postcompletion monitoring of retrofit outcomes for major schemes to support continuous learning and citywide performance improvements.</i>	We can consider whether to include some text about post-implementation monitoring for retrofit schemes however compliance with any such statement would be entirely voluntary and we would not need a planning policy to ask for such information. This issue may be better addressed through an “Informative” on decision notices.	Consider proposed wording going forward.
	Retrofit proposals should also consider their impact on natural resources including air, water, and soil, and take opportunities to mitigate environmental harm.	Noted.	No Action Required
	Urban Design (Placemaking) Retrofitting of buildings should also encompass improving accessibility for all, some heritage assets do not offer step free access.	Policy R3 addresses retrofit measures in relation to energy efficiency and climate change adaptation.	No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	Also, policies throughout the local plan refer to conserving/protecting heritage assets, so retrofitting buildings could also include physical measures e.g. Boundary treatments, to provide a level of protection if a hostile incident occurred.	Where development involving heritage assets is proposed, this are specifically covered by policies HD1-5.	

All Public Responses – Draft Policy R4

Do you have any comments on Policy Option Set 009a (draft policy R4): Air Quality Assessments and Standards. If you have any additional comments please put them in the comment box.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	82	26.11%
Agree with Preferred Option	43	13.69%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	12	3.82%
Do not know	1	0.32%
Not Answered	163	51.91%

Draft policy	Topic	Summary of comments	Response
R4	Preferred option	Various comments supporting option 1	
R4	BBOWT	Strongly support preferred option.	Support welcomed.
R4	Preferred option	Strongly support preferred option – target is more ambitious than elsewhere.	Support welcomed.
R4	Air quality a serious health issue.	Agreement that air quality is a serious health issue. Also comment that no development is more important than healthy children and clean air.	Agreed, the health impacts of poor air quality is a key driver for why we are proposing the policy.

R4	No need for local policy which goes beyond national requirements.	National planning guidance already mandates Air Quality Assessments – some also commented that these are restrictive enough. Layering a blanket Oxford-specific AQA plus a tighter 30 µg/m³ NO₂ cap on every major scheme simply adds modelling fees, lengthens determinations and squeezes viability, yet cannot cure the dominant pollutant source—regional road traffic—without city-wide transport reform.	Any level of air pollution can have detrimental impacts for health including the minimum acceptable targets required nationally. The Council's air quality action plan is a key strategic document which captures the local ambitions for driving improvements in air quality in the city beyond national minimums. Whilst there are a range of initiatives for tackling air quality across various sectors outside of the Local Plan's influence, the Local Plan's policies play a role in ensuring that new development is designed in alignment with this wider strategy for the city by ensuring that new developments are not permitted which would conflict with these local ambitions.
R4	No need for local policy	No need for extra micro-managing by the city, or 'don't need a local policy' more generally. Concern about increasing layers of regulation and policy requirements.	Comment noted – see other responses (e.g. above) for why we believe a local air quality policy is necessary.

R4	Need common sense.	Need common sense.	Comment noted.
R4	Relationship between transport and housebuilding.	Inclusion of transport within housebuilding criteria is long overdue. Estates and developments should be designed with a presupposition that car travel is not the norm. Some general comments were made about the need for vehicle movements need to be reduced as far as possible, and that even hybrid and EVs are responsible for various non-exhaust emissions. Other comments included that the policy is not effective as it only addresses air quality, not the wider problems caused by traffic. That the Local Plan does not acknowledge Oxford's responsibility to tackle climate change by reducing the factors that lead to congestion and emissions. Nor does Local Plan offer solutions relating to reducing car traffic.	It is important to note that the Local Plan has limited influence over the transport network as much of this sits within the wider County Council's control. However, we acknowledge the strong need for reducing reliance on private vehicles and the various roles they play in contributing to air pollution and wider issues relating to congestion in the city. The policy is clear (in criterion a) that Air Quality Assessments need to consider the impacts of all the sources of air pollution generated during the development's operational and construction phases, including but not limited to transport. Separately, Chapter 7 sets out various policies in relation to supporting and encouraging more uptake of sustainable/active transport modes and seeking to ensure

			occupants do not have to rely upon on private vehicles wherever possible.
R4	Parking at Headington hospitals	Oxford can (via planning) reduce destination parking especially at the Headington Hospitals.	
R4	Impact of woodburning needs to be addressed.	Air Quality assessments are meaningless if the impact of woodburning is not addressed (even from so-called eco-stoves).	Noted – air quality assessments would need to consider all sources of air pollution.
R4	Local Plan does not define areas of poor air quality.	Policy does not define areas of poor air quality..	Whilst there are monitored hotspots for more regularly occurring poor air quality in the city – such as those which are monitored and reported upon on the Oxonair website, the nature of the problem is that air pollution can arise from various sources and be transient or temporary in nature – e.g. where it relates to construction processes or changes in traffic patterns and can be difficult to map. We have incorporated a link to the council's air quality webpages and the above county wide mapping within the supporting text.

R4	Change reference to mitigation to 'netzero'	The word mitigation must be replaced with 'net-zero'	The term net zero more broadly means to ensure no net increase – e.g. in the context of carbon emissions, it means ensuring the
			same amount of carbon dioxide is removed from the atmosphere to balance out anything emitted and ensure no overall net increase as a minimum. Mitigation is a broader term, but is effectively about avoiding, or else seeking to reduce the severity of impacts.
R4	Policy needs to be enforced.	Stressed that the policy needs to be enforced. Concern flagged about pollution impacts arising from various major developments in the city including Cherwell House, the Old Power Station, Network Rail, Gibbs Crescent, and that this is not reflective of a 'world-class city'. This includes periods when residents cannot open windows even in a heatwave and pollutants coating streets.	Similar to our earlier responses against policies R1 and R2, the policy sets the requirements that will need to be met through the planning application. The permission would be granted subject to a condition that the development is built in accordance with submitted documents. Were an applicant to fail to build in accordance with the condition they could be subject to enforcement action.

R4	Objection – Headington Hospitals parking provision (and others)	The policy and goals are ineffective without urgent reduction of Headington Hospital (John Radcliffe, Churchill and NOC) car parking provision. The three Headington Hospitals, football fields of staff car parking (70%) is mostly responsible for air quality, health and environmental issues caused by vehicles in Oxford as a whole, as the centre of transport and employment is now Headington, causing miles of traffic jams every day and gridlocking Headington and Oxford in general.	Comment noted, however, parking provision at the hospitals is not within the scope of this policy.
R4	Increase pedestrianised areas.	Pedestrianised areas must be increased; the number of 'through' roads in residential areas should be decreased; walking and cycling networks of high quality should be joined up throughout the City as a long-term goal Plan after Plan.	Comment noted – the Local Plan has various policies which seek to support walking/cycling/wheeling (chapter 6).
R4	Is noise factored into policy?	Does air quality include noise? I used to live in countries where heat pumps are normal, and there is no such thing as a quiet heat pump.	Noise would be addressed through separate Policy R8.
R4	Council should prioritise	Agree with principle but feel that Council should prioritise and be less concerned about issues which are felt to have limited/no impact on city-wide air such as personal home-use bbqs and bonfires, which are part of the importance of quality of life.	Comment noted – the policy covers the design and operation of new development, it is unable to control how occupants behave in the development.

Statutory Consultee Responses – Draft Policy R4

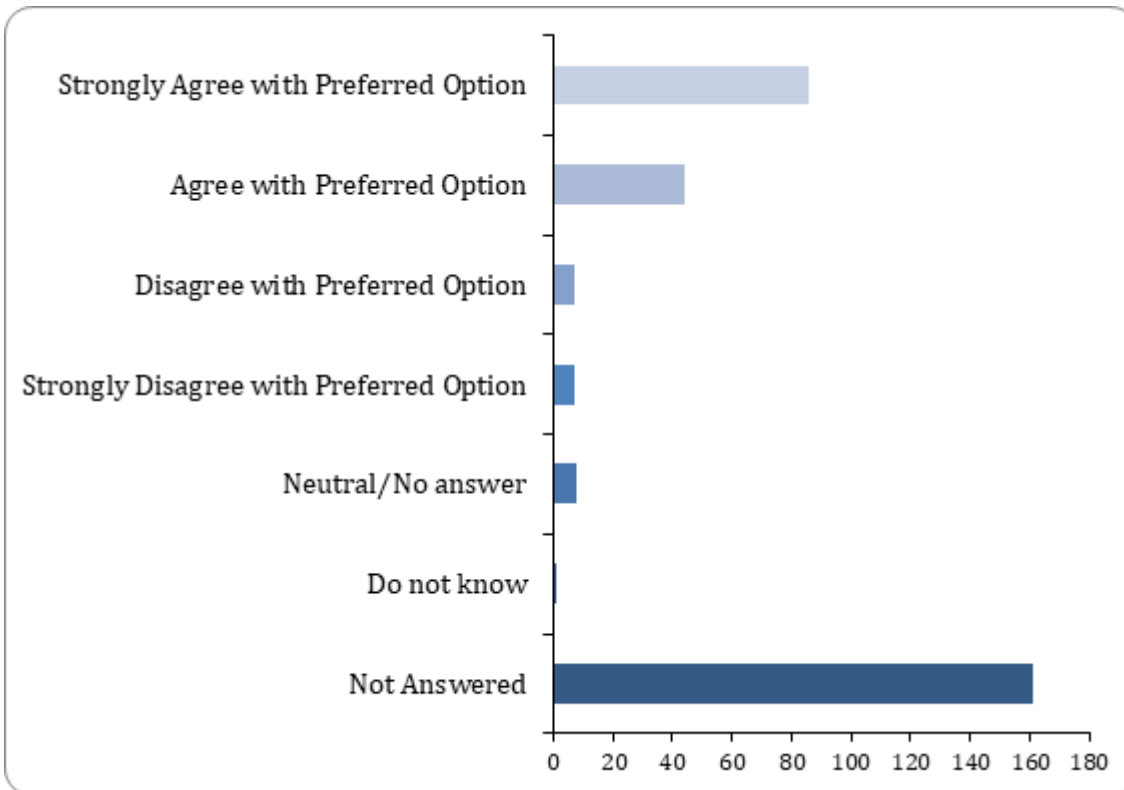
Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy R4 Air Quality Assessments and Standards	Strategic Planning Air quality is a particular issue for Oxford, and the entire city is an Air Quality Management Area. Transport schemes and transport policy that the County Council is working on with the City Council have an aim of improving air quality. Public Health	Noted.	No Action Required
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	The inclusion of sensitive receptors (schools, nurseries, care homes and healthcare settings) is welcomed, although developers should also be considering the impact of schemes on outdoor amenity such as parks and greenspaces, especially where young children are likely to play.	Noted. The list of sensitive uses set out in the policy is not exhaustive.	No Action Required

All Public Responses – Draft Policy R5

Please let us know what you think of Policy Option Set 009b (draft policy R5): Water Quality and Resources. If you have any additional comments please put them in the comment box. There were 153 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	86	27.39%
Agree with Preferred Option	44	14.01%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	8	2.55%
Do not know	1	0.32%
Not Answered	161	51.27%

Draft policy	Topic	Summary of comments	Response
R5	Preferred option	Comments supported different options e.g. some flagged support for alternative option 1, whilst others supported option 2.	
R5	BBOWT	Strongly support preferred option.	Support welcomed.
R5	General support	Comments supported the policy generally including that anything to support the improvement in city's watercourses is welcome.	Support welcomed.
R5	Need for strongly emphasising using water prudently and protecting water quality so as to not allow new development to further exacerbate pollution problems in watercourses.	Comments about need for strong emphasis on using water prudently and for protecting water quality, and that new development should not be allowed to exacerbate water pollution problems or have an adverse affect on water bodies or groundwater. There were also general comments flagging ongoing concern about the pollution issues impacting the city's watercourses and the role of water companies and new development in this problem.	Comments noted – this new policy has been incorporated into the Local Plan 2045 to ensure the issues around water resources and water quality are taken seriously and considered as part of applications. The policy is being further updated following the Reg 18 feedback and we have sought to emphasize these messages within the supporting text to the policy also.

R5	Bespoke policy is unnecessary.	Preference for folding water requirements into other policies. Bespoke policy duplicates requirements such as Building Regs' cap of water use to 110lppd, as well as EA regulation of foul-and-surfacewater discharge, as well as the Local Plan's other policies such as Flood-Risk/SuDS. Bespoke policy would mean applicant's need to prepare another consultant report and also push marginal brown-field schemes further from viability.	The building regs optional 110 lppd standards need to be enforced through local policy. The EA, along with various other stakeholders, have also put forward a strong preference to us that a bespoke water quality/resources policy is needed (indeed ever since preparation of Local Plan 2040). The policy's development is being informed by Whole Plan viability
			assessment which will consider any viability impacts arising from it, as with all policies in the Local Plan.
R5	Bespoke policy is unnecessary.	No need for bespoke policy/interference from the Council and/or national policy is sufficient.	See response above.

R5	Importance of grey water reuse and stronger requirement in policy.	Various comments about need for incentivising/requiring grey water capture and reuse. Suggestion that Council could work with Thames Water to inform constructors of cost-saving implications of water-saving measures. Also that the policy could be more strongly worded in terms of mandatory inclusion of designs to use grey water. One suggestion to require all new builds to have water re-use from basins/showers/baths to flush toilets. Another suggested a change to wording by removing the words 'where appropriate: "All applications should demonstrate what other measures have been incorporated into the design to conserve water use including rain/grey water harvesting/reuse where appropriate."	Comments noted and we agree that grey water and rainwater recycling is an important way to help conserve water resources. We have expanded on the policy requirement in the supporting text to further emphasize the variety of measures applicants might be able to consider and that might be suitable for their proposal. The wording 'where appropriate' was intended to reflect that each application will be different and different measures may be suitable for each proposal – we will consider further whether this is necessary.
R5	Lawns are not sustainable – grey/rainwater should at least be used to maintain them.	Passion for lawns in the Colleges is ecologically unsustainable on water management and biodiversity grounds. At the very least, Colleges should be using grey water for watering these. Terrific systems being applied at the scale of households in both Germany and Australia that make really good use of grey water.	Maintenance and management of existing green spaces is something that is not within the scope of the Local Plan to influence. We concur with the importance of making use of grey and rainwater recycling wherever possible, see above comment.

R5	Sewage	Concerned that the issue of sewage discharge and treatment is barely referred to at all, which is totally incompatible with the plans to build large number of houses in Oxford and the surrounding area. There is an assumption that Thames Water will provide the necessary upgrades to the water treatment plant at Sandford-uponThames (“Oxford STW”) in a timely fashion to meet the large increase in wastewater discharge resulting from the large-scale developments proposed in the draft local plan. Any approval for residential development needs to be contingent on appropriate foul network and treatment facility upgrades being completed before any occupation of new development is permitted. The proposed Policy R5 is insufficiently robust and will, if not substantially amended, lead to an increase in pollution which will impact on peoples’ health – including those using the watercourses for pleasure or work or other uses.	Comments noted - We have sought to ensure that the supporting text for the policy in the Reg 19 Local Plan emphasises the ongoing water quality concerns in the city, and the various impacts contributing to this including sewage discharges, alongside other updates to the policy to strengthen where practical. The Council continues to engage with Thames Water to ensure that they are aware of growth planned for in the Local Plan and that this can be accommodated and the supporting text will also encourage applicants to engage directly with them as early as possible as proposals come forward.

R5	Threshold for foul and surface drainage is too high.	Policy Threshold for requiring a Foul and Surface water drainage is set too high. Smaller development can also impact the sewage network (both individually and cumulatively). Threshold should be set much lower, i.e. 10 dwellings or more. Strategies should consider existing developments' impacts before development allowed.	The requirement seeks to ensure the largest developments go further to demonstrate how foul and surface water will be managed through a strategy because they could have particularly significant impacts. It is acknowledged smaller scale development can still have an impact and the policy will still
			require proposals of smaller scales of development to demonstrate how they have mitigated impacts that are within the applicant's control.
R5	Improvements to Sewage treatment works should be monitored through the policy.	Various stages of improvements promised for the Sandford Treatment works should be monitored by the Council and the results obtained made available for public inspection as part of the suggested policy.	Whilst the upgrades to the sewage treatment works are an important step in addressing water quality concerns in the city, they are not directly in the control of this policy or the Local Plan and as such this would not be the correct mechanism through which to undertake the monitoring suggested.

R5	Water shortages should be addressed.	All new planning applications must address the issue of water shortages which is clearly going to be a real problem during the timeline of the draft plan.	Agreed. The new policy is intended to present the issue of prudent water use more clearly through the Local Plan (where previously water use requirements were spread across various other policies) and sets various requirements for new development to address in relation to this issue.
R5	Impact on water bills	Concern requirements will mean increases in water bills.	It is unclear why or how the new policy would directly drive increases in water bills. Indeed, the policy should help to ensure that new development reduces its impacts on the water
			environment, and by extension, associated infrastructure that maintains this.

R5	Retention of green frontages to properties to deal with drainage issues	Abandon unenforced SUDs maintenance as an idea and have a local policy requiring retention of earth/grass/other vegetation on frontages for all properties to deal with recurring drainage issues.	Addressing the issue of surface water run off requires a variety of responses and design measures. Equally, SuDS can take many forms, including areas of natural green space and other features. We concur, that limiting artificial surface cover on new developments is important (for a wide range of issues) and would direct you to other policies, including the new Urban Greening Factor requirements (draft policy G3) which seeks to ensure new developments have areas of natural surface cover.

Statutory Consultee Responses – Draft Policy R5

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R5	Strategic Planning We welcome the introduction of a separate policy which deals with water resources and support the	Noted.	No Action Required

Water Resource and Water Quality	setting of a policy which require all dwellings (including conversions, reversions and change of use) to achieve an estimated water consumption of no more than 110 litres per person per day, and encouraging all non-residential development to demonstrate what measures have been incorporated to reduce water use. Minerals and Waste Policy and Strategy The County Council is responsible for wastewater treatment, Policy W10 of the Oxfordshire Minerals and Waste Core Strategy (2017) allows for proposals for the treatment and disposal of wastewater and sewage sludge.	Noted. Oxford does not have any wastewater treatment facilities within its administrative boundary.	No Action Required

Environment Agency

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R5	Welcome the inclusion of water quality policy, but currently find it unsound as it is not robust in relation to addressing water quality concerns. Policy does not meet requirements of paragraph	Whilst we are keen to ensure that the policy meets the EA's expectations and responds to the requirements of the Water Framework Directive, it is	Meeting organised to discuss these comments with the EA and agree amendments to the policy that might overcome these concerns.

	187e of NPPF which requires plans and planning		

	decisions to ensure that there are no unacceptable levels of water pollution. Appropriate measures must be in place to ensure; delivery of growth does not outpace required wastewater infrastructure improvements and growth does not lead to a deterioration of the water environment. Development must only be permitted where it can be demonstrated that there is adequate provision for the treatment of wastewater in place to prevent wastewater leakage into the environment including rivers. This is to maintain and improve waterbody status in Oxford as required under Water Framework Directive. Suggest a few changes/amendments to the policy wording but are willing to work with Council regarding how the policy wording could be strengthened.	important that the policy requirements are justified and deliverable in terms of what can be expected of a developer making an application. We would propose a meeting in order to discuss these comments further with the EA in order to find the best way to respond to these concerns and strengthen the policy where possible.	

R5	Pleased to see emphasis on separation of foul and surface water drainage. Should also highlight the hierarchy of drainage options that must be considered and discounted in the following order: 1. Connection to the public sewer 2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation) 3. Septic Tank. This must be considered when applications are made for wastewater/sewage/foul water disposal from all new development. In a sewerage area such as Oxford City, private	We will reflect on how best to reflect this feedback in the Local Plan where appropriate, bearing in mind that some of this is set out in national guidance and may not necessarily need to be repeated here. Some of these considerations may be better reflected in supporting text or a Technical Advice Note. Again, we would like to discuss further with you.	As above.
	discharges to non-mains drainage systems must be avoided in line with the hierarchy of options. Deep infiltration systems for non-mains foul drainage or surface water disposal are not optimal discharge solutions, and should be avoided wherever possible. Techniques and designs which treat and manage rainwater and surface water drainage without allowing the runoff to soak into the ground (infiltration) is necessary for protecting groundwater sources. Changes suggested to policy for consideration.		

R5	There are important and sensitive water resource receptors in Oxford such as designated bathing water at Wolvercore Mill Stream which should be recognised within the local plan policy, with a commitment to working to achieve and maintain sufficient status of these sensitive receptors. Changes suggested to policy for consideration.	We agree with the suggested change to bullet point two of the policy, we will also look to flag the presence of designated bathing water in the supporting text as it is useful context.	Amend to policy wording to reference designated bathing water. Reference to be added into supporting text also.

Thames Water

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R5 Water resources and quality	Important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and	It will be important to continue to work together to ensure that Thames Water are aware of the Local Plan's provisions and that necessary	Continue to engage together. We would aim to document this as part of a Statement of Common Ground in due course.

	wastewater infrastructure to serve all new developments.	upgrades to infrastructure are planned for accordingly.	

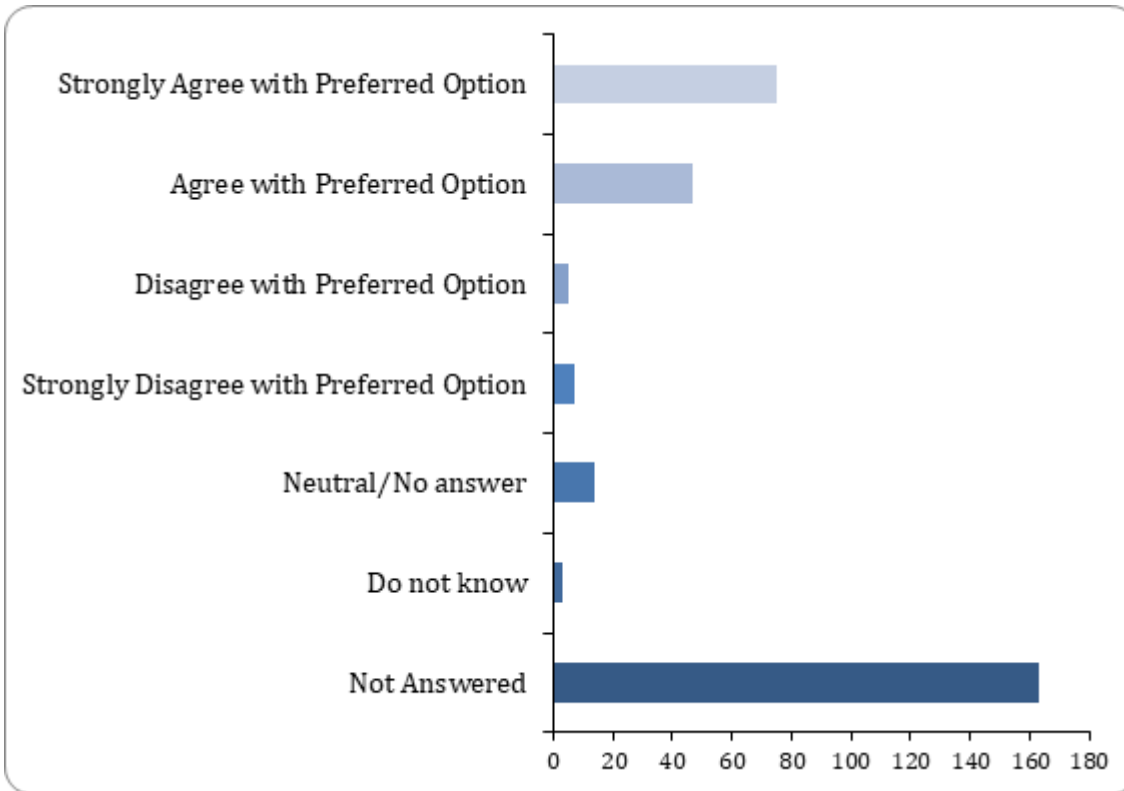
R5 Water resources and quality	Recommend that developers engage with them at the earliest opportunity when bringing forward a proposal to establish the following: • The demand for water supply and network infrastructure both on and off site; • The demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. Also flag that time to undertake upgrades to infrastructure can be lengthy, so early engagement from developers is important where possible. Thames Water offer a pre-planning service to assist applicants (on their website).	Noted, we concur it could be helpful to reiterate the recommendation of early discussions between developers and Thames Water where possible and can add this into supporting text to the policy.	Updated policy to be published as part of Reg 19.
R5 Water resources and quality	Support references to water efficiency and requirement of the water efficiency standard of 110 litres per person per day using the fittings approach. This is an important tool to help sustain water supplies for the long term, particularly in light of future climate change. This should be required by condition.	Support welcomed. We can make it clearer in supporting text that the requirement will be subject to a condition.	Updated policy to be published as part of Reg 19.

R5 Water resources and quality	Additional wording suggested to the policy in relation to requirements for conditions to ensure occupation aligned with delivery of upgrades, and about when development or expansion of water supply or waste water facilities would be permitted.	The Council does not currently consider these as necessary or helpful additions as they can be dealt with through existing mechanisms/other policies,	No change proposed at this time.
		but we would be happy to discuss further.	

All Public Responses – Draft Policy R6

Please let us know what you think about Policy Option Set 009c (draft policy R6): Soil Quality. If you have any additional comments please put them in the comment box.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	75	23.89%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	14	4.46%
Do not know	3	0.96%
Not Answered	163	51.91%

Draft policy	Topic	Summary of comments	Response
R6	Support for policy	Generally support policy, or support option 1	Support welcomed.
R6	BBOWT	Strongly support preferred option.	Support welcomed.

R6	No bespoke policy needed	No bespoke policy should be included. Duplicates requirements of DEFRA's Code of Practice, the Environment Agency's permitting and the Building Regulations. Additional local requirements would make redevelopment of brownfield edges and former allotments more complex, lengthen geotechnical investigation phases and push up costs, yet deliver marginal environmental gain in a city where peat outcrops are rare. Streamlining makes land recycling swifter and more affordable.	The Local Plan policy reflects the Council's priority for conserving and enhancing the natural environment, and soils are a key dimension of this. It will help to ensure applicants evidence how they have considered impacts on soils and sets out a consistent list of principles which we would look for applicants to respond to. Some of the references flagged in the comment are guidance to assist developers only (e.g. DEFRA code of practice). Where applicants need to undertake some of the same actions to meet other regulatory requirements, they can use this as evidence for how they have met the policy. The additional requirements around development in proximity to peat reserves responds to the limited national protections for these deposits despite the particular importance of their protection in

			light of their relatively finite nature and the various benefits they provide.
R6	Current wording is too restrictive	The impact of the consideration of soil quality in all development proposals (as the policy is currently worded) would further restrict the opportunities for development. This could further sterilise development opportunities on sites where there are other conflicting constraints on the site.	The policy simply asks that applicants demonstrate how they have sought to mitigate impacts on soils and taken up opportunities for conserving and enhancing them. Additional requirements are set out for protecting the limited remaining peat reserves on undeveloped land in the city, for the reasons outlined in the above response. We feel that this is a pragmatic approach, without being overly prescriptive, which seeks to ensure the design of new development takes soils into account and limits further damage where possible.
R6	No bespoke policy needed	Council should not micro-manage and/or no need for bespoke local policy (no further reason given).	Comment noted, see above responses for why we consider a local policy is important.

R6	Objection – lack of clarity	Policy should define clear rules and metrics.	As a new policy for the Local Plan, we have sought to frame its requirements in the most practical and effective way possible. Every proposal will be different, and each site in the city will have a different context (e.g.

			varying levels of historic development, varying quality of soils), thus it is challenging to set strict rules/metrics). The policy flags key considerations which applicants need to demonstrate they have responded to in relation to soils. These generally cover the broad ways development can impact on soils but will be of varying relevance to each application depending on what is proposed. Additional sensitivities around the city's remaining peat deposits have prompted more specific requirements (e.g. not allowing losses or dewatering of peat as a result of new development, and assessing potential for impacts on undiscovered peat in near vicinity to known deposits).

R6	Unclear on impact for pitches	Unclear on what impact policy has for new playing fields or improvements to existing ones. Sport England has detailed guidance on the provision of new grass playing field available on their website.	Where a proposal relating to pitches requires planning permission and would meet the thresholds in the policy, the application would need to respond to the requirements in the same way as other types of development.

R6	Addition to policy needed	Addition to policy needed in a local by-law requiring retention of degraded peat areas identified in the Oxford City Council area, pursuant to a general policy of restoring them through re-wetting and promoting the return of wetland biodiversity using Lye Valley as seed source.	The Local Plan sets a framework through its policies for how new development should happen in the city, including where this should come forward, what standards it should meet and how impacts on the wider environment need to be avoided/mitigated. Whilst this new policy seeks to protect existing deposits of peat from loss due to development, regardless of their condition, as well as asking applicants to mitigate impacts on soils more generally, it is beyond the Local Plan's scope to require general restoration of deposits in the city. This would need to be pursued through other mechanisms outside of the Local Plan's control.

R6	More mapping of peat needed.	Welcome the precautionary 200m buffer around known peat reserves, however, stress that Council should actively be mapping peat (making use of local sources of info) and not just rely on Natural England mapping. Mapping should be included on policies map.	It is outside of the resources of the Council to pursue active investigation and mapping of additional areas in the city unfortunately. We intend to include peat reserves on the policies map to aid applicants.
R6	General comment on threats to peat	Peat is at risk from climate change (particularly hotter/drier summers). Need to find ways to ensure peat stays wet and protected	We concur that peat reserves are an important store of carbon –
		such as by preserving green spaces in catchment, reducing the ongoing threats to existing reserves e.g from erosion due to surface water run off after storms. Also favouring fen restoration in city (e.g. Lye Valley LWS). Another comment flags that peat conserves carbon better than a tropical rain forest so restoration is an elementary necessity for UK Climate policy.	this is one of the reasons for the new policy requirements around recorded peat reserves in the city – and that they are under threat from various pressures including climate change. As referenced in response earlier, whilst the Local Plan can include certain requirements in relation to mitigating impacts from new development on these important reserves, there are limitations to what else is within the scope of the Local Plan's influence – such as driving improved management of these areas.

R6	Objection	Peat reserves should be identified including Lye Valley, Dunstan Park, Headington Hill north slope (along A40) (Ruskin, Larkin's Lane Field), along with demarcation of groundwater and surface water catchments. The 200m buffer is considered to be entirely arbitrary. Once a report is written, what are the metrics to permit or not permit the development?	We intend to identify recorded peat reserves on the policies map to assist applicants. In the absence of clearly defined best practice, we identified the 200m buffer in liason with Natural England to be a pragmatic and proportionate area to investigate around recorded deposits in acknowledgement that there could be additional deposits which are not well recorded.

Statutory Consultee Responses – Draft

Policy R6

Oxfordshire County Council

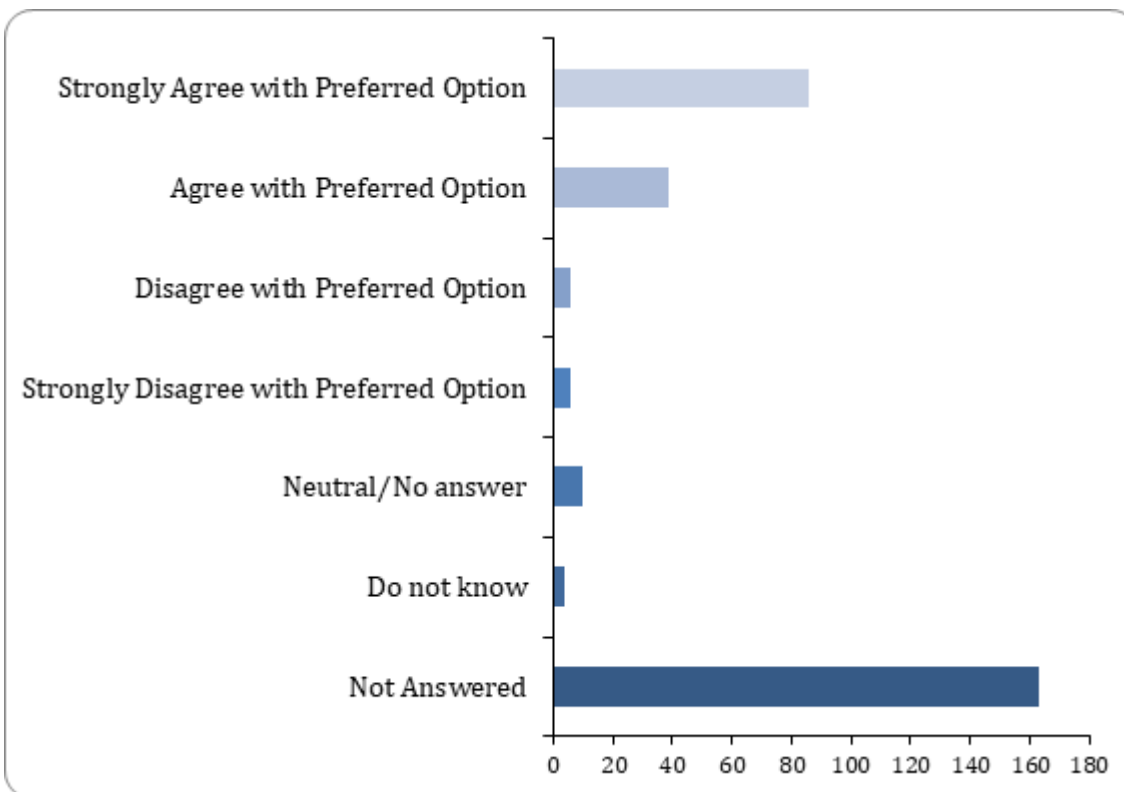
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	Landscape and Nature Recovery – Biodiversity		

Policy R6 Soil Quality	It would be useful to define what is considered 'highest quality soils' in the context of this policy. For example, nutrient poor soils would have a high value for biodiversity and creating species rich grassland habitats but a lower value for activities such as agriculture that would value a high nutrient soil content.	We will seek to provide a definition of 'highest quality soils' in the Reg. 19 version of the plan.	Oxford City Action: Consider proposed wording going forward.

All Public Responses – Draft Policy R7

Please let us know what you think about Policy Option Set 009d (draft policy R7): Contaminated Land. If you have any additional comments please put them in the comment box.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	86	27.39%
Agree with Preferred Option	39	12.42%
Disagree with Preferred Option	6	1.91%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	10	3.18%
Do not know	4	1.27%
Not Answered	163	51.91%

Draft policy	Topic	Summary of comments	Response
R7	Preferred option	Some general support for preferred option	Support welcomed.
R7	No need for bespoke policy.	No bespoke policy needed. Duplicates requirements of Part 2A of the Environmental Protection Act, the NPPF and the Environment Agency's Land-Contamination Risk-Management guidance. Local policy results in another report, validation step and more professional fees, with no material gain in public health or environmental protection. Streamlining supports brownfield schemes viability and allows new homes/workspaces to be delivered quicker.	The Local Plan policy reflects the extensive nature of historic land uses in the city which could give rise to potential risks from contamination and the need for this local context to be taken into consideration when developing sites in Oxford. It sets out the specific local requirements which the Council will need to see addressed to be satisfied that potential harms arising from contaminated land have been appropriately responded to.
R7	No need for bespoke policy.	No need for bespoke city policy – no further reason.	Comment noted, see response above.

R7		Couple of issues flagged with wording which states that responsibility for securing a safe development rests with the developer and/or landowner. Lack of records about a site's remediation could mean subsequent development may undermine measures/expose problem again - proposed plans for developing Bertie Park given as example. Also does not specify a role for the local authority who may/may not have records of the previous contamination and remediation which applicant should be aware of. Council should be able to access a comprehensive record of previous contamination for remediated land.	The wording relating to responsibilities for securing a safe development lying with the developer/landowner are simply reflective of national policy. In relation to the Council's role, the draft policy sets out the requirements for the supporting information which the Council is asking proposals for new development to be accompanied by and which it will be assessing
			the application against. The supporting text for the policy will set out that the Council will refer to its own records of potentially contaminated sites when assessing whether land contamination is an issue, as well as other information sources.
R7	Thames water and contamination of water.	Concerns with trusting that Thames Water will be able to deal with wastewater and clearing up potential contamination of water. Would like to know more about the recent agreements made by Oxford City Council with Thames Water and Environment Agency.	Concerns noted. Information relating to the agreed upgrades for the Oxford Sewage Treatment Works were published online earlier in 2025.

R7	Policy wording should be amended to ensure the requirement for a Preliminary Risk assessment in the first instance is included. This should be the initial assessment to be undertaken in an area where there is suspected contamination. Changes suggested to policy for consideration.		We agree with these changes, subject to a couple of minor tweaks, this will be reflected in the Reg 19 draft.	Policy R7 updated
R7	Risk of explosions after failed remediation	Concern about risk of explosions happening in new development areas because remedial measures have not been taken before the site was developed.		The policy sets out the assessments that the Council will expect applicants to undertake where there are potential risks of contamination, and requirements around any remediation where necessary. Where site investigation and remediation measures are needed, these will be required as a condition of any planning permission.

Statutory Consultee Responses – Draft

Policy R7

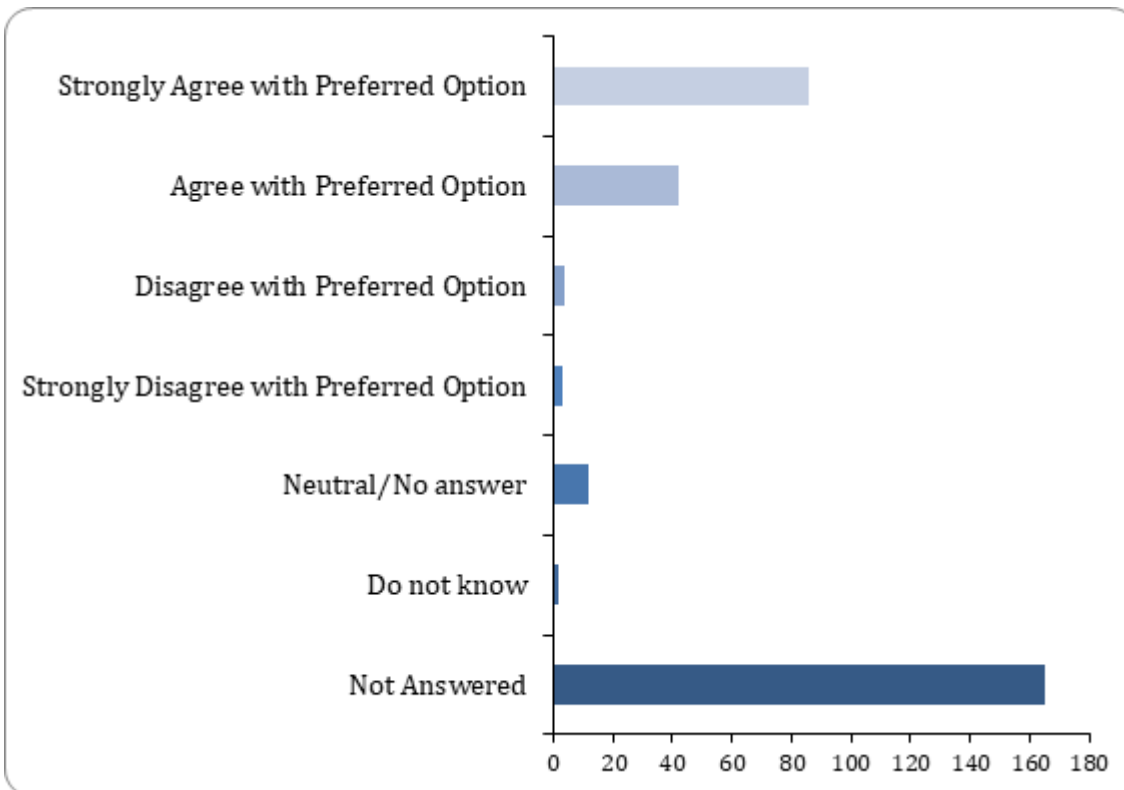
Environment Agency

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

All Public Responses – Draft Policy R8

Please let us know what you think of policy options set 009e (draft policy R8): Amenity and environmental health impacts of development. If you have any additional comments please put them in the comment box.

There were 149 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	86	27.39%
Agree with Preferred Option	42	13.38%
Disagree with Preferred Option	4	1.27%
Strongly Disagree with Preferred Option	3	0.96%
Neutral/No answer	12	3.82%
Do not know	2	0.64%
Not Answered	165	52.55%

Draft policy	Topic	Summary of comments	Response
R8	Preferred option	Some general support for preferred option and/or need for policy addressing amenity generally as well as that the Local Plan should support making Oxford neighbourly and help promote good collaboration between roads.	Support welcomed.
R8	Need to do better in future compared to previous developments in city.	Concern that amenity impacts have not been considered previously to detriment of existing residents and existing buildings. Examples such as over-development of Mill Street area, development in west Oxford quoted in some comments. Also comments that future developments need to be better.	Comments noted.
R8	Support wording re: Impacts on waste and wastewater.	Support the mention of impacts on waste and wastewater. Concerns about Thames Water being able to deliver.	Comments noted and support welcomed, see responses to comments against policy R5 which discuss these issues further.
R8	Support, with suggested addition	Support policy but wording in the Joint South and Vale Local Plan should be considered for inclusion in Oxford Local Plan also: “protect landscape character, dark skies and the natural beauty of the countryside in development decisions’	Comment noted – however the city’s urban setting differs significantly to other more rural areas. The policy does set out that planning permission will only be granted for development that ensures that the amenity of communities, occupiers, neighbours and the natural environment is protected.

R8	No need for bespoke policy	No need for bespoke policy – no further reason given. Another comment suggested national requirements are sufficient.	Comment noted – the Local Plan policy brings together all of the key amenity impacts of particular relevance to developing in the city. It is considered important for
			ensuring that applicants appropriately address these issues as part of their proposal so that the amenity/environmental health of existing residents as well as future ones are protected.
R8	Support for the agent of change principle	Support the “agent of change” advisory principle (para 5.36) to protect valuable music and cultural venues	Comment noted - we have also flagged readers to the agent of change requirements of the NPPF in supporting text.

R8		Amenity of existing users of public amenities like recreation grounds should also be protected. New MUGAs can be noisy. Placement near housing means considering not only the rights of occupiers, but the rights of young people to have a place to go. Buffer zones are particularly important in this regard. Ignoring this simply sets up a situation where conflict that could have easily been predicted will then require management - with implications financially and social/health impacts.	The policy seeks to ensure that new development (regardless of proposed use) is designed appropriately to mitigate any relevant impacts on existing users, whilst also ensuring design is appropriate so as to protect amenity of users of the new development. Whether particular buffer zones are needed, and the specifics of what these should entail, will be highly dependant on location and types of uses proposed and this is difficult to specify in the Local Plan policy. See comment below regarding buffer zones.
R8	More clarity needed re: requirements for noise assessment	Wording at end policy in relation to noise and when noise assessment needed is very unclear. Should be written simpler and with targets, such as decibel levels and distance of buffer zones.	The requirements for any assessment will depend upon the particular context of the location where development is proposed.
			We may be able to provide additional guidance through a supporting technical advice note and will consider this in due course.

R8	Impacts of noise pollution	Noise pollution is often overlooked but has been widely shown to be detrimental to health.	Agreed that noise is an important health issue, which is part of the reasoning for why it is included as a consideration in the policy.
R8	Stronger policy requirements re: light pollution	Stronger policies needed for reducing light pollution, by requiring all existing and new developments to have lighting which is targeted, proportionate and sensitive. Increased use of very bright/poorly designed lighting in commercial and domestic development has negatives for people and nature.	We have expanded on the wording in the design checklist in the Local Plan appendix relating to external lighting about the need for lighting. The Local Plan's requirements would not be able to be retrospectively applied to existing developments.
R8	Various issues which should be covered in the policy.	'Etc' should include increased risk of flooding, loss of privacy, pedestrian and bicycle congestion as well as vehicular.	The criteria as set out in the draft policy address these issues to varying degrees, other than flooding – which is addressed through separate policy requirements (see policies G7 and G8 of chapter 4).

R8	Policy should apply to construction too, and also mention public engagement.	Clause also needed to include during construction of these new proposals/developments and strong local public engagement to be undertaken.	The supporting text to the policy will make clear that impacts from development include not only the development in operation but also during the construction process. Public engagement during the planning process is a
			wider consideration than just this policy, there are no particular demands relating specifically to this policy (and not to others) that would warrant its explicit reference here.
R8	Policy should be expanded in relation to HMOs.	Preferred option needs expansion: enlarging existing HMOs should be obstructed on car parking, noise, amount of council bins required and any other applicable grounds.	The policy sets a framework of amenity/environmental health considerations which apply to all types of developments – though to varying degrees depending on the specifics of the proposal. This would already encompass applications relating to HMOs.

Statutory Consultee Responses – Draft Policy R8

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R8 Amenity and Env. Health impacts of developments	Minerals and Waste Policy and Strategy Welcome reference under point l) regarding impact on waste and wastewater infrastructure. Policy W11 of the Oxfordshire Minerals and Waste Local Plan Core Strategy 2017 prevents the permission of development that would directly or indirectly prevent	Noted.	No Action Required
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	or prejudice the use of a site safeguarded for waste management.		

Thames Water

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

R8 Amenity and environmental health	The new Local Plan should assess impact of any development within the vicinity of existing sewage works/sewage pumping stations in line with the Agent of Change principle set out in the NPPF. Note that this is recognized at paragraph 5.37 of the draft Local Plan.	Without having specific detail about how individual sites would come forward, it is unclear how this would be achievable or beneficial without being subject to a lot of uncertainty. We have added in requirements for odour assessments where applicable in policy R8 in response to another comment from you. The Agent of Change principle will continue to be referenced in the policy.	No further change proposed at this time.
R8 Amenity and environmental health	Where development is being proposed within 800m of a sewage treatment works or 20m of a sewage pumping station, the developer or local	Thanks for the suggestion, we will add additional wording into the policy to	Updated policy to be published as part of Reg 19.

	authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station. The odour impact study would establish whether new resident's amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer – and would be in line with various paras in NPPF and PPG. Additional wording suggested in relation to requirements for technical assessment looking at potential of odour impacts.	expand on expectations in relation to odour in proximity to the sewage treatment works.	

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R8	Definition of 'unacceptable transport impact'	Sports England flag that where new sports facilities are proposed this may mean additional traffic. But there is no explanation of 'unacceptable transport impact' is.	What would result in an unacceptable impact will be highly dependant on the

			nature of the location, existing

Sports England

			network, and what development is proposed.
R8	Impact on applications involving lighting	Sports England have concern about how policy applies to planning applications for sports lighting or lighting of streets to support active travel. Gives no acknowledgement of the benefits of outdoor sports lighting or street lighting to providing health communities. Policy strongly favours 'the amenity of communities, occupiers, neighbours and the natural environment'	Undoubtedly there are valid reasons for various types of lighting as part of new development, however, a balance needs to be struck between needs of the development and managing impacts on neighbouring uses. The policy is focused on ensuring that this balance informs the design process.

R8	Impact on sports facilities	Sports England also concerned about how this applies to new outdoor sports facilities. The policy offers no context for applicants as to when a noise assessment will be needed, so it may be required for very minor planning applications. Sport England's planning guidance on 'Artificial Grass Pitches Acoustics Planning Implications' may be helpful for the development of this policy. The agent of change principle also works the other way, for example, housing development should not be located near existing 'noisy' uses such as existing MUGAs, artificial pitch facilities or playing fields with sports lighting. There does not appear to be a policy that expands on paragraph 200 of the NPPF so it is recommended that this is also developed.	The requirement for noise assessment will be highly dependent on the context including location, type of development proposed and is challenging to define explicitly. We will consider whether additional guidance could be helpful as part of a Technical Advice Note in due course. The supporting text will make it clear that amenity considerations apply both to impacts created by new uses, but also impacts arising from existing uses, and that both dimensions need to inform the proposal.

All Public General Responses to Chapter 5

Draft policy	Topic	Summary of comments	Response

Chapter 5	Supportive	Various comments providing support for policies in this chapter.	Support noted and welcomed.
Chapter 5	Need for sustainable development	Comment across all policies about need for promoting sustainable development, climate adaptation, energy efficiency and offsetting adverse environmental effects.	Agreed, the policies of chapter 5 (and in part chapter 4 in relation to adaptation) are intended to promote these topics.
Chapter 5	Solar PV arrays	Object to placing large swathes of solar PV in Green Belt areas. Council should prioritise maximising solar PV on all rooftops both residential, community, commercial.	The Local Plan does not allocate greenfield land for solar PV, nor does it seek to encourage this. See also responses against policy R1 below.

Chapter 6 – A City that Respects its Heritage & Fosters Design of the Highest Quality

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Headlines for Chapter 6:

- Preserving Oxford's unique heritage must be prioritised

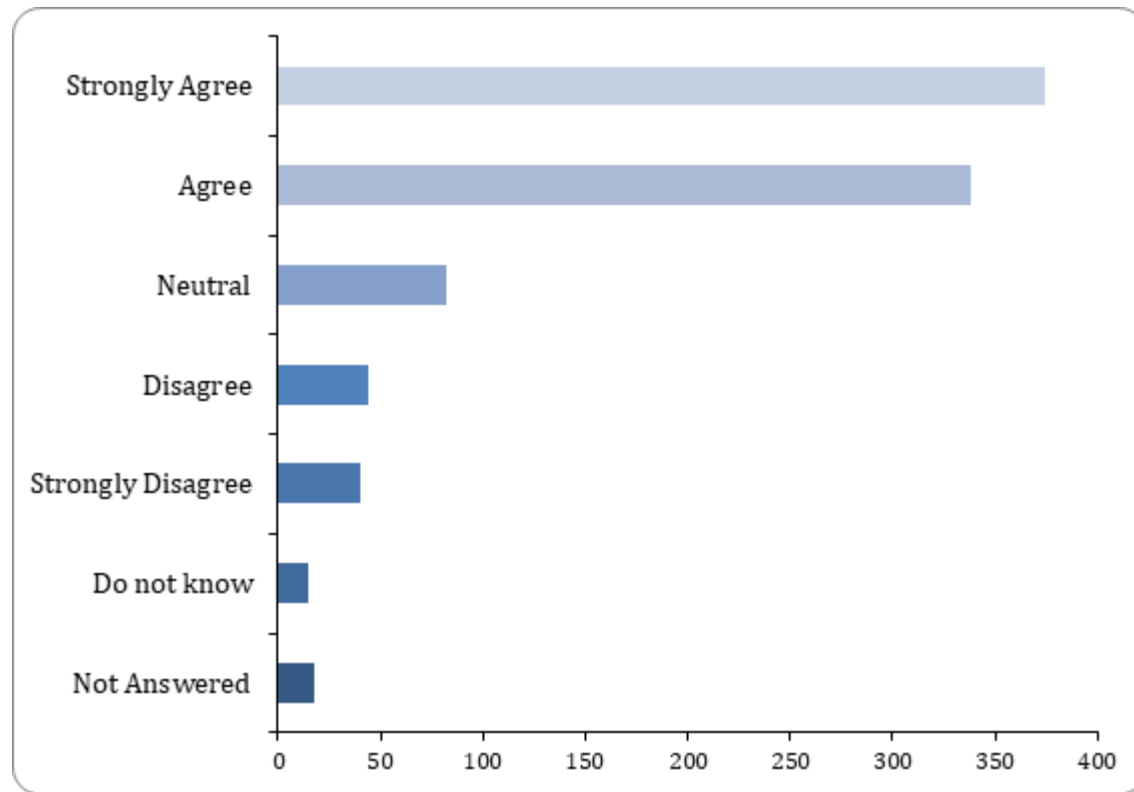
- Other comments expressed a different sentiment, that heritage should not hold back green innovations (such as retrofitting), housing expansion and businesses
- General support for medium-to-high density development, to maintain green belt and third spaces however, infrastructure must also be to a high standard
- Some comments perceive the policies are ineffective, either because they are not specific enough or because they are seen to be included in the NPPF
- Affordable housing and new developments need to be of a high quality (good materials and design) to allow them to last
- New developments should merge with the character of the surrounding built environment, including heritage
- Green space is crucial for health, wellbeing and climate adaptation
- To become a cycling city, bicycle infrastructure needs to be improved • CycloX supports all policies in this chapter

Short questionnaire responses

Good design

Good design is about ensuring development functions positively for the people who live and work there and that it makes best use of land and respects heritage. We have also drafted a policy that requires high density development and efficient use of land first and foremost, alongside policies to ensure design respects heritage including views of the renowned skyline. To what extent do you agree with this approach?

There were 893 responses to this part of the question.

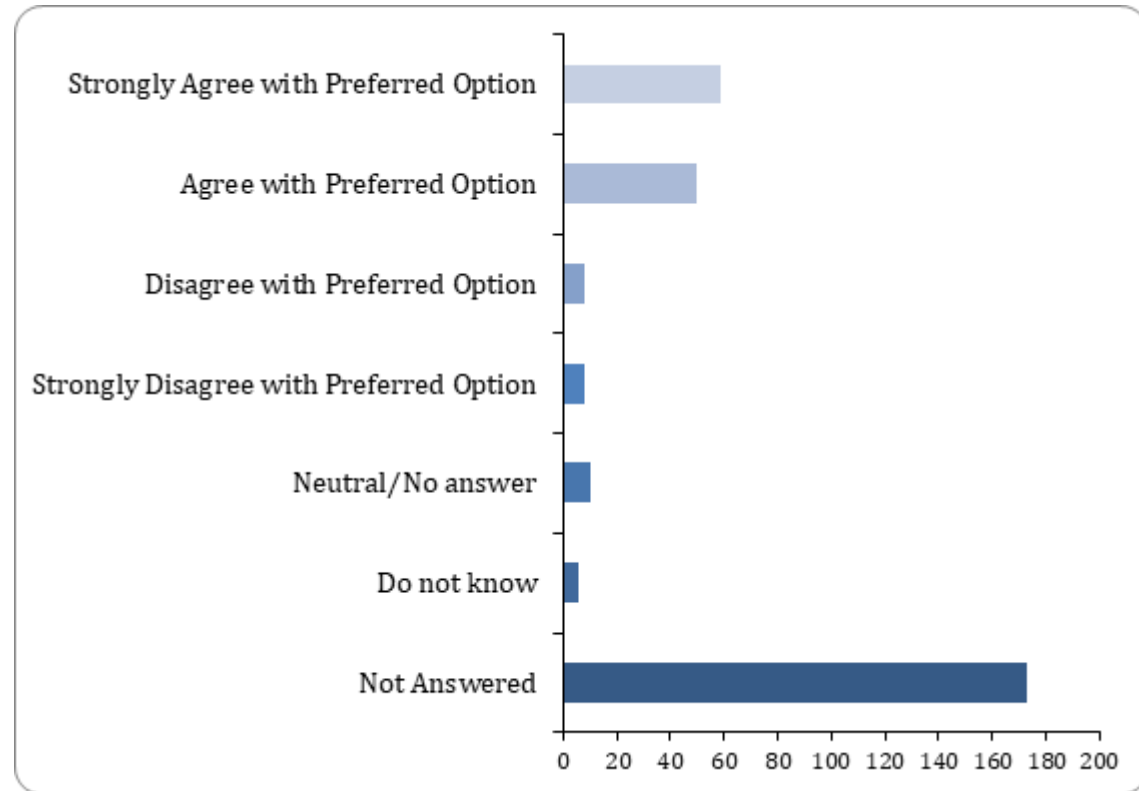


Option	Total	Percent
Strongly Agree	374	41.05%
Agree	338	37.10%
Neutral	82	9.00%
Disagree	44	4.83%
Strongly Disagree	40	4.39%
Do not know	15	1.65%
Not Answered	18	1.98%

All Public Responses - Draft Policy HD1

Please tell us what you think of policy options set 011a (draft policies HD1, HD2, HD3, HD4): Designated Heritage Assets. If you have any additional comments please put them in the comment box.

There were 141 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%

Agree with Preferred Option	50	15.92%
Disagree with Preferred Option	8	2.55%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	10	3.18%
Do not know	6	1.91%
Not Answered	173	55.10%

Draft policy	Topic	Summary of comments	Response
HD1-HD9	Supportive	We strongly support these policies. Like those on green infrastructure, they should be given very strong weight in recognition of the outstanding heritage importance of the city as a whole and the contribution made by individual historic assets including many non-designated historic assets.	Noted, support welcomed.
HD1	Should be reworded to reflect NPPF	It is noted that the draft policy states that 'substantial harm to or loss of significance of a conservation area should be wholly exceptional'. It is considered that the word 'wholly' should be removed from the policy drafting as this is not consistent with the wording of paragraph 214 of the NPPF.	The NPPF provides a national context. The policy has been combined with others relating to designated heritage assets and reworded.

HD1	Objection	Conservation Areas are not up-to-date and ineffective as many have large sections destroyed, so should be drawn to new boundaries, removing areas that no longer have anything to preserve. For example, Headington Hill “Conservation Area” includes Clive Booth Student Housing, Oxford Brookes Campus and modern housing estates, whereas much of Central Conservation Area, due to recent developments, has all the charm and atmosphere of Swindon, this is supported by NPPF Para 191. Almost all development in Conservation Areas will confer substantial benefit, by for example, providing more housing which will always be a “substantial public benefit” so Policy HD1 becomes ineffective. It is contrary to NPPF Para 201 which states several tests to be met which are omitted in the policy. Conservation area boundaries should be reviewed with a view to removing parts which have been destroyed.	The conservation areas are considered to remain relevant. They all contain newer development and will always be evolving, but the special characters that led to their designation in the first place remain relevant and it is not considered that parts of conservation areas in Oxford are ‘destroyed’. Instead of repeating all of the NPPF, the Policy (no redrafted Policy HD3) refers to the criteria in paragraph 214 or equivalent if updated (was para 201).
Draft policy	Topic	Summary of comments	Response

Statutory Consultee Responses – Draft Policy HD1

Historic England

		Proposed modifications: • Shrink Conservation Areas to parts where something remains to conserve. • Remove “substantial public benefits” clause, revert to NPPF para. 201 etc. • Update fluffy wording such as responds, considered, informed to specifics such as must not etc. • Add, (and consult), the Conservation Area Appraisals have not been added to the evidence base as they clearly have never been consulted in this Local Plan	

Policy/Topic	Summary of Comments	Officer Response	Outcome

HD1	Welcome the changes made to the policy. Only query relates to use of phrase “to avoid harm” in the paragraph at the top of p123. Is that phrase needed? Potentially it risks overlooking the potential to enhance the conservation area by responding sensitively. Also, it might make it	We have removed the wording from the policy as suggested.	Amended policy and addressed in supporting text.

Policy/Topic	Summary of Comments	Officer Response	Outcome
	harder to reach a balanced outcome, where harm is minimized. That being so, might “to avoid harm” be deleted?		

All Public Responses - Draft Policy HD2

Draft policy	Topic	Summary of comments	Response
HD2: Listed Buildings	Detailed wording comments about requirement to enhance.	The drafting of the policy risks implying that there is a policy requirement to 'enhance'. The NPPF para 210 encourages enhancement where desirable but does not mandate it (in line with the Act). Should be rebalanced so the statutory duty to preserve significance is clearly identified as the primary requirement, with enhancement presented as a desirable aspiration, rather than an obligation.	Re-drafted Policy HD3 covers all designated heritage assets and refers to the NPPF rather than incorporating its wording.

2443

Statutory Consultee Responses – Draft Policy HD2

Historic England

Policy/Topic	Summary of Comments	Officer Response	Outcome

HD2	Welcome the changes made to the policy. In the opening paragraph, suggest integrating the concept (from the NPPF) that the more important the asset, the greater the weight should be. Note typo “ess than substantial” Also, maintain a concern about referring to compensation in the context of harm to heritage significance. Suggest a different way of framing this in terms of the delivery	Happy to take these suggestions on board.	Policy HD3 refers to the significance of the asset. Deletion of wording in relation to compensation. Typo amended.
Policy/Topic	Summary of Comments	Officer Response	Outcome
	of other heritage benefits (<i>suggested wording provided</i>).		

All Public Responses - Draft Policy

HD3

No public comments about draft policy HD3.

Statutory Consultee Responses – Draft Policy HD3

Historic England

Draft Policy	Summary	Response	Outcome
HD3	Welcome changes to policy, but question whether the policy could be tailored further to be more locally specific and whether more context can be added to inform decision making. Trust that the detailed wording in the supporting text that was agreed through the SoCG for LP2040 will be carried forward. <i>(Suggested wording provided in appendix to their comments).</i>	The draft of the policy was absent of the supporting text which is where we planned to add more context, including detail we previously agreed for the LP2040. This has now been incorporated into the draft supporting text.	Supporting text drafted with additional contextual details. Policy wording updated to incorporate HE's suggestions.

All Public Responses - Draft Policy HD4

Draft policy	Topic	Summary of comments	Response
HD4: Scheduled Monument s	Detailed wording comments about requirement to enhance.	The requirement that a proposal should identify 'enhancement to the significance of the Scheduled Monument (including its setting) where possible' goes beyond the Act, which focuses on preservation, and the NPPF which encourages but does not require enhancement.	Policy HD3 is re-worded with greater reference to the NPPF, rather than incorporating its wording within the Plan and to cover all designated assets.

Statutory Consultee Responses – Draft Policy HD4

Historic England

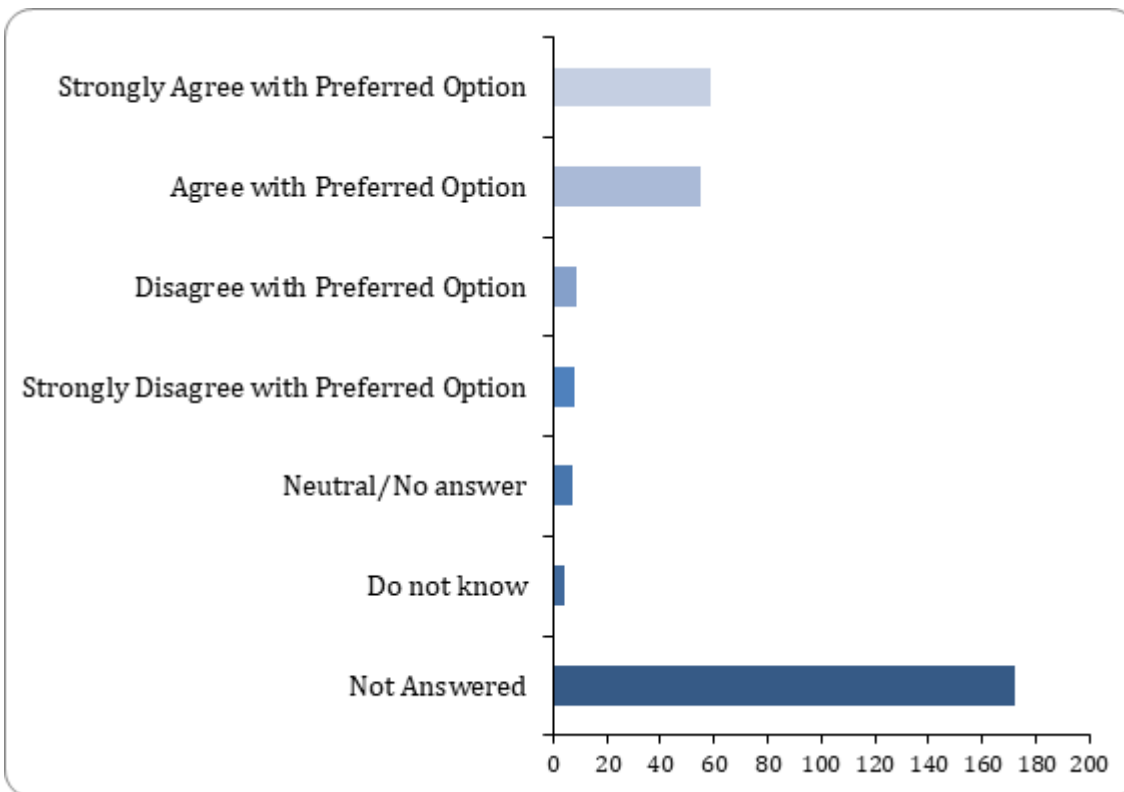
Policy/Topic	Summary of Comments	Officer Response	Outcome
HD4	Welcome changes made to the policy. As with HD2, maintain a concern about referring to compensation in the context of harm to significance and offer alternative wording for consideration (<i>suggested wording provided</i>)	Happy to take suggestion on board as with HD2.	Re-drafted Policy HD3 covers all designated heritage assets and refers to the NPPF rather than incorporating its wording.

2446

All Public Responses - Draft Policy HD5

Please tell us know what you think of policy options set 011b (draft policy HD5): Non Designated Heritage Assets. If you have any additional comments please put them in the comment box below.

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%
Agree with Preferred Option	55	17.52%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	7	2.23%
Do not know	4	1.27%
Not Answered	172	54.78%

Draft policy	Topic	Summary of comments	Response
HD5	Policy wording should reflect NPPF	It is agreed that there are buildings within the City that do not warrant formal Listing but make an important contribution to the character and appearance of the area and therefore, should be afforded due regard in considering development proposals. The policy as proposed requires the impact of the development upon the significance of a non-designated heritage asset to be weighed against the ‘public benefits’ of the scheme. This is out of alignment with the requirements of the NPPF (paragraph 203) which states that ‘a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the asset’. The policy should reflect this test rather than the test associated with designated heritage assets.	Wording removed to align with the NPPF.
HD5	Allow for individual nominations for non-designated heritage assets	Historic England in Advice Note 7 (2nd Edition) clearly states that individual non designated heritage assets can be identified within conservation areas and makes the distinction between CA protection and NDHA protection via LA Registers. Other LA’s have encouraged local people to get involved in identifying and surveying NDHA’s in their conservation areas. The current rules the City Council have set out for registration have created a 2 tier system with communities and citizens outside CA’s given preferential treatment allowing them to nominate possible NDHA’s for consideration to be registered. This is because it is very possible that a CA appraisal will not identify all of the heritage assets might be valued by local people in that area and Conservation Area Protections differ in their criteria from the criteria that can be applied to NDHAs.	The Policy is clear that the Oxford Heritage Asset Register is only one way that non-designated heritage assets may be identified. A non-designated heritage asset is considered in the same way in a proposal however it is identified. There is no greater (or lesser) protection for those on the OHAR, or indeed for those listed in a conservation area appraisal.

Draft policy	Topic	Summary of comments	Response
		NDHA are usually criteria are more akin to those of formal listing which identify more than just external appearance for protection. The NDHA Register, like listing, can allow for interiors and special features within a buildings structure to be protected for instance. CA protection does not. So I ask that the Local Plan 2042 Policy HD5 includes a provision to allow individual non designated heritage assets to be nominates by members of the public or communities even if they are in a CA. Then that the criteria for nomination be modified to allow this also. This would remove the in equality that I have pointed out and probably add and protect many assets and their special features which being in a CA cannot.	
HD5	Comment	Goal seems to write a report rather than define the degree of harm that would acceptable.	Comment noted.

Statutory Consultee Responses – Draft Policy

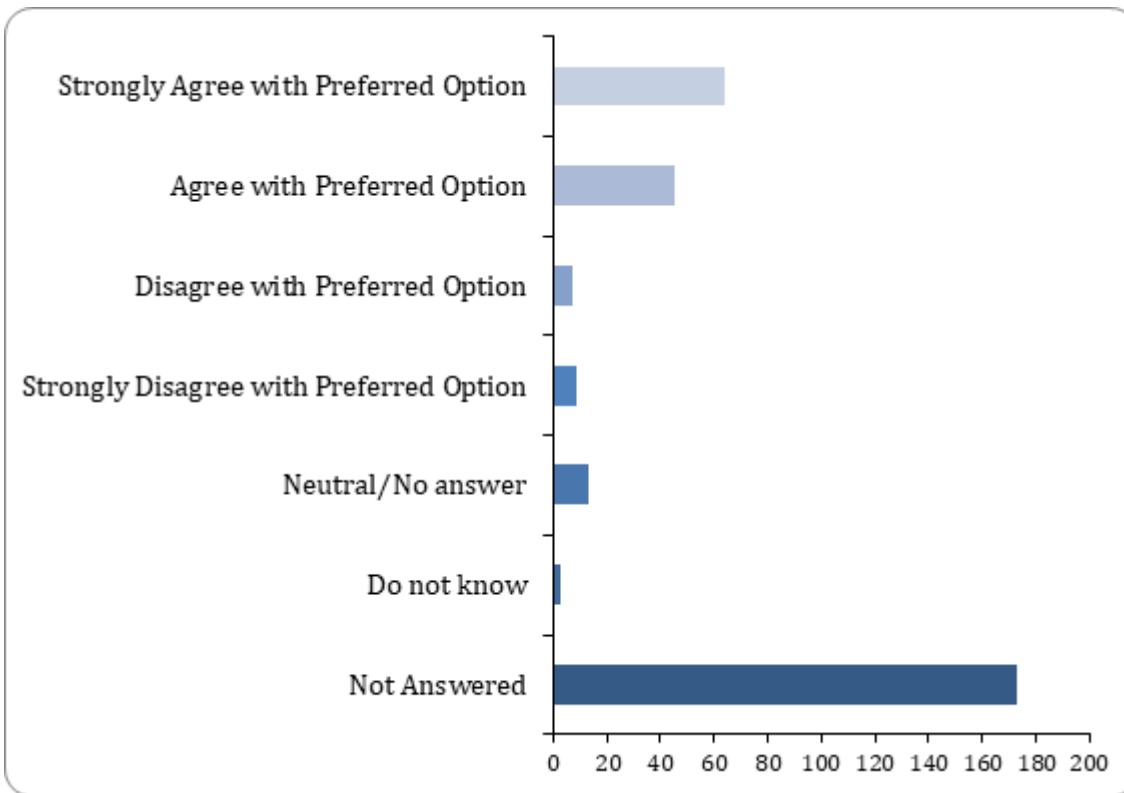
HD5

No statutory consultee comments on draft policy HD5.

All Public Responses - Draft Policy HD6

Please tell us what you think about policy options set 011c (draft policy HD6): Archaeology.
If you have additional comments please put them in the comment box.

There were 141 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	64	20.38%
Agree with Preferred Option	45	14.33%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	13	4.14%
Do not know	3	0.96%
Not Answered	173	55.10%

Draft policy	Topic	Summary of comments	Response
HD6	Support with suggested amendments	CPRE would like to see policy “proactively” map areas of known archaeological interest. We support the general intent to not allow development unless harm is removed, although feel the wording of the sentence in relation to mitigation is unclear and ask for this wording to be revisited: “mitigated to an appropriate level, conserving the remains and the significance of the archaeological or paleoenvironmental asset better revealed and understanding of that significance enhanced (by agreed measures). “	The central area has such a concentration of archaeology of such high significance that it is very likely to be present. Other areas do not have quite such a concentration over a particular area, but the potential is across such large areas of the city that to map too many particular areas may falsely give the impression that areas outside them may have little interest. Wording re mitigation has been checked for clarity.
HD6	Comment	The policy reads as if central Oxford is the only place of any importance. Headington is far older as a settlement and manor, for example.	The policy explicitly refers to the ‘City Centre Archaeological Area, on allocated sites where identified, or elsewhere where archaeological deposits and features are suspected to be present’.
HD6	Policy not strong enough	Language should be stronger. Should require professional site-based assessments. Should require protection rather than talking of ‘mitigation’ which admits harms.	The policy approach needs to be proportionate and cannot assume that the presence of archaeology will prevent development.

Draft policy	Topic	Summary of comments	Response
		college management plans) turns normal due diligence into a costly pre-planning obstacle course that discourages brownfield development.	policy that responds to this is required.
HD6	Support	Good and clearly expressed.	The support is welcomed.
HD6	Flood risk and basements	Basement additions to university/college areas should be resisted on drainage ground wherever appropriate, as well as archaeological ones.	Flooding and drainage issues are dealt with in separate bespoke policies.
HD6	Have no policy	Rely on national policy for archaeology only. The local elements (the City Centre Archaeological Area, mandating desk-based assessments for any 'suspected' deposits and whole-	The significance of archaeology in Oxford means that a bespoke

Statutory Consultee Responses – Draft Policy

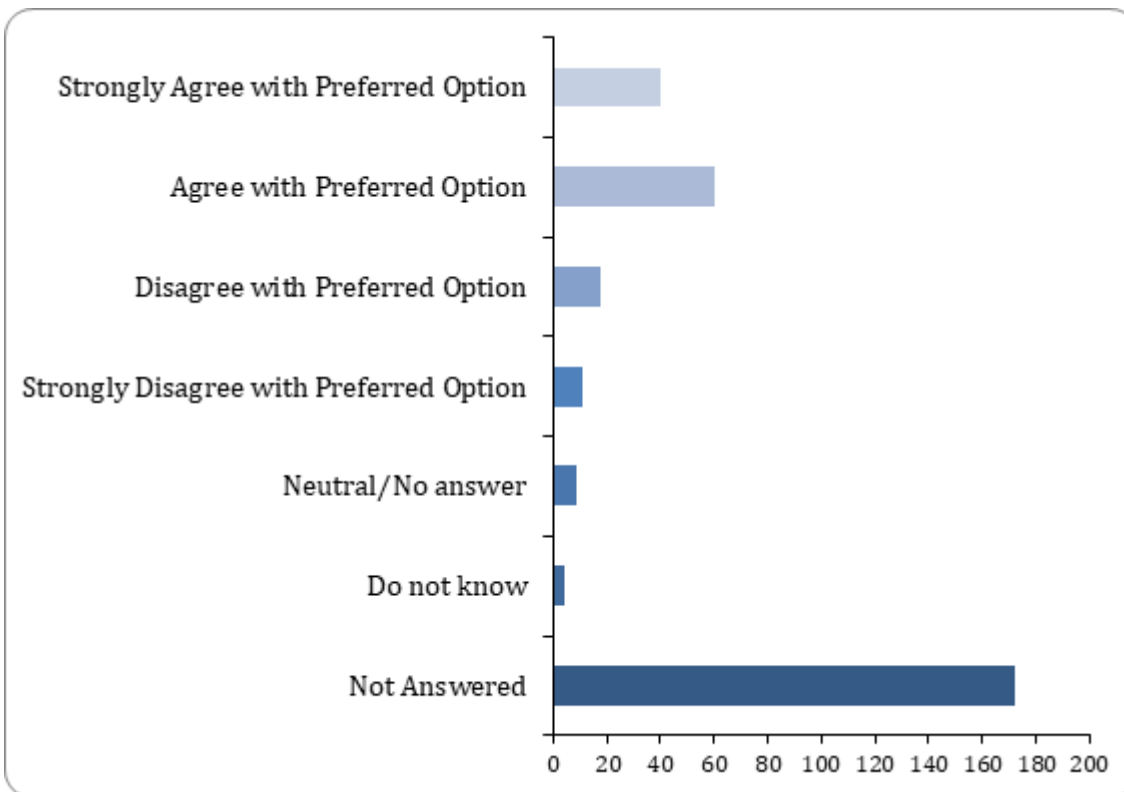
HD6

No statutory consultee comments on draft policy HD6.

All Public Responses - Draft Policy HD7

Please tell us what you think of policy options set 011d (draft policy HD7): Principles of High Quality Design of Buildings. If you have any additional comments please put them in the comment box.

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	40	12.74%
Agree with Preferred Option	60	19.11%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	11	3.50%
Neutral/No answer	9	2.87%
Do not know	4	1.27%
Not Answered	172	54.78%

Draft policy	Topic	Summary of comments	Response
HD7	Strongly support	ONV supports high quality design in the city. This should be proportionate to the location and setting of the proposed development and should recognise the form of development proposed.	Noted, welcome support.
HD7	Support	Christ Church supports high quality design in the city. This should be proportionate to the location and setting of the proposed development, and also viability considerations.	Support for policy is welcomed.
HD7	Support	Yes... and building should be built with a life expectancy of greater than 20-30 years! We have a city full of buildings that have lasted >500 years so new developments should be built with longevity in mind to reduce their environmental impact.	Support for policy is welcomed
HD7	Should prioritise design checklist questions.	Design Checklist or Questions should include hierarchy of design priorities and consider various scales (major / minor) and types (residential / commercial) of development. The local plan should rely on either the checklist or the existing policy questions, not both, to avoid confusion and ensure policy compliance.	Elements of design should be considered in the round and can't be prioritised. The policy links to the checklist, where the detail is included.

HD7	Objection	Policy Is ineffective. The vast majority of applications, namely, householders, are excluded from the necessity to provide even a basic rationale for the proposal. Modification proposed: Remove Householder application exception, this is covered by the proportionality clause.	Many of the detailed assessment criteria under this policy will not be applicable to householder applications, and a mandatory requirement will require additional work from the application while not bringing significant value. It should be noted that householder applications refer to small scale proposals such as extensions that

Draft policy	Topic	Summary of comments	Response
			are subordinate to existing buildings, and distinct from erection of new self-contained dwellings.

HD7		The policy has not reflected how new measures will meet the carbon emission reduction goal and how the design should cope with climate change.	The design checklist includes climate change resilience, carbon emissions and net zero building operations as considerations for assessing a proposal. The plan is to be read as a whole and this policy will not be applied in isolation. There are a number of environmental policies that are included in the plan, and they will be applied where relevant.
HD7		Alternative Option 2 is best as good design does not come from a checklist, but (for most development in Oxford being brownfield), from appraisal of the existing site and building and surroundings to find the effective solution.	Noted.
HD7		Agree with the principle; but the current approach to assessing "high quality" is fundamentally flawed, as shown by a number of developments in Oxford. For a start, the [design review] panel is not permitted to understand the local community within which the development sits, and makes its assessment based on some pretty pictures with no local context. It is also influenced by developers' assertions without testing them against local reality. Would like to see this changed and the whole panel approach rebooted.	Site visits occur in nearly all cases and understanding the local context is an important part of achieving high quality design. However, it is the case that the panel meetings actively involve the applicants, City Council

Draft policy	Topic	Summary of comments	Response

			officers and the panel only, to keep focus on design issues. It is important to note this is only a part of the process of developing and assessing planning applications.
HD7		"High Quality Design" is much too vague a term and useless in practice. Any planning consultant can demonstrate that any building, whatever its quality, is "high quality" . It is a scandal that City policy has been so weak on heritage assets. It should be a fundamental principle that proposals should enhance and preserve the building affected and the area around it. There should be tight controls on materials, style and size to ensure that these are appropriate to the surrounding buildings and area. Conservation Area Appraisals must be produced for all Conservation Areas especially the Central City area which is still incomplete after many years and these should inform precise requirements in any area.	Applicants will have to demonstrate the merits of their proposals and provide justification for their choices through an assessment of specific criteria and design considerations. Pre-application discussions and where required design reviews are also part of the process of the assessment of applications. Conservation Areas in the city nearly all have had conservation area appraisals produced for them, including the Central City CA whose conservation area appraisal was adopted in November 2023.

Draft policy	Topic	Summary of comments	Response
HD7		"Responsive to the site" is often cited in rejecting designs of increased bulk and massing relative to the existing building or the nearby street scene. This suppresses densification, which forgoes increased housing capacity, which we are severely lacking, and particularly increased housing capacity at the most environmentally-sustainable locations. We should explicitly call out circumstances where increased height, bulk or massing are appropriate in order to deliver more housing than could be achieved at present building height and mass-- - Nearby (not necessarily immediately neighbouring) to other buildings of comparable size - Close to public transport links and amenities -- this would likely in practice mean close to district centres - Out of the immediate proximity of highly sensitive heritage assets - In locations with a CPZ or other parking management such that the consequences of increased motor traffic can be managed	Densification and the efficient use of space are supported in the plan where they are suited to the setting and create no adverse impact on the local and city-wide character, and where there is no adverse impact on the amenity of the occupiers of development or the adjoining uses. The plan includes an efficient use of land policy (policy HD8) and a views and building heights policy (policy HD9) which in combination with the High Buildings Study sets out locations in the city that are best suited for added height, and the criteria that proposals will be assessed against to avoid unnecessary harm to the unique visual and spatial environment of the city.
HD7	No policy required	Government interference in decoration just seems unnecessary. Even for the purpose of promoting aesthetics (which is of dubious value relative to the practical purposes buildings serve), variety is	Local authorities are required to prepare design guides or codes consistent with the principles

		valuable and having a checklist seems potentially counterproductive.	set out in the National Design Guide
Draft policy	Topic	Summary of comments	Response
			and National Model Design Code. It is a good way to set out the principles of good practice in design and placemaking, which go beyond just visual appearance. It can also allow for requirements to be tailored to specific local contexts. There is no fixed format, and the checklist we seek to use functions as a series of prompts for applicants to consider if key principles have been followed. They can also be a useful starting point for discussions with officers at early design stages to address any points of concern or contention.

Statutory Consultee Responses – Draft Policy HD7

Oxfordshire County Council

Policy/Topic	Summary of Comments	Officer Response	Outcome
Policy HD7	Strategic Planning		

Policy/Topic	Summary of Comments	Officer Response	Outcome

	Appendix 1.1 appears to be comprehensive and includes consideration of accessibility and sustainable transport as well as climate change and net zero, use of sustainable materials and thoughts regarding future proofing. As such, we welcome the approach given to this Appendix. Urban Design (Placemaking) Paragraph 6.30 - Design quality must also be thought about in relation to the ongoing stewardship and maintenance once delivered, particularly in relation to public realm. Paragraph 6.30 - spelling mistake - The Council has a Design Review Panel <i>what</i> can give advice so that designs can be reviewed and improved at the informative stage prior to the formal determination of the application	Noted. Maintenance arrangements are considered in Policies, G2, G5, G6 relating to GI and designated ecological sites, policy G8 – SuDS, R2 – Embodied Carbon, and numerous references are included within the design checklist itself. Noted.	No Action Required No Action Required Oxford City Action: Review typos

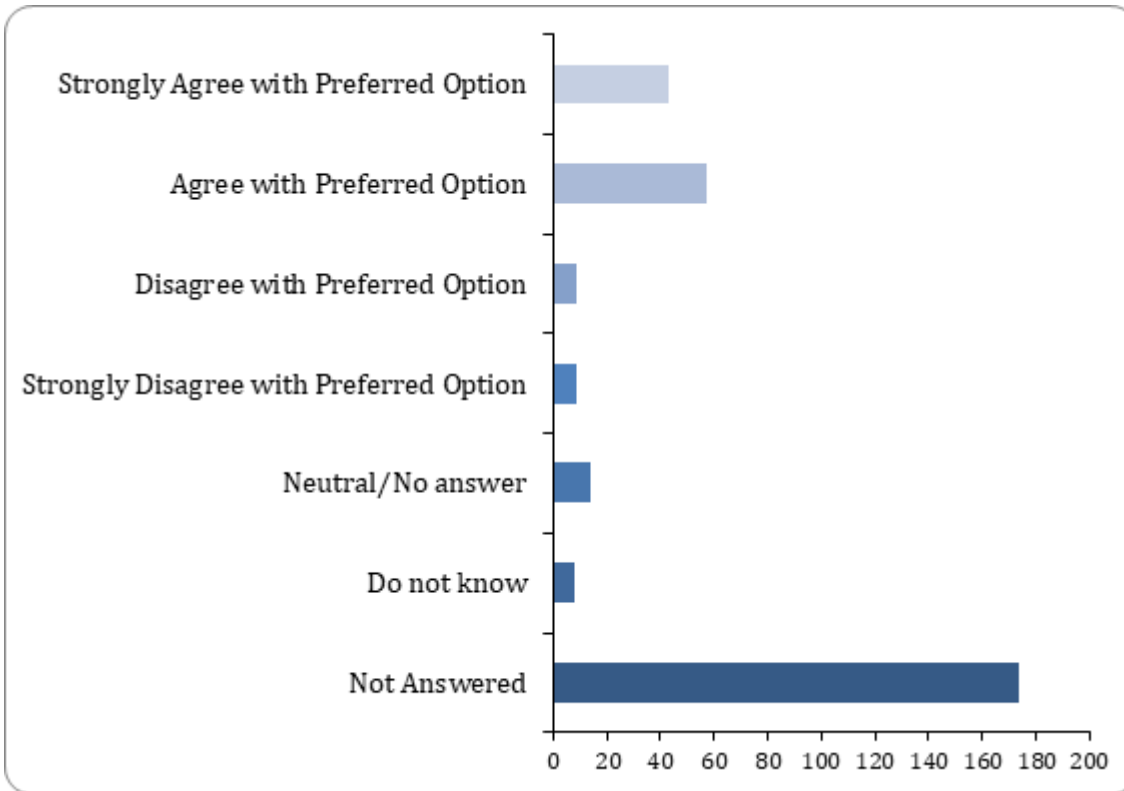
	Paragraph 6.31 - The function and uses of streets, spaces, buildings need to be considered		

Policy/Topic	Summary of Comments	Officer Response	Outcome
	as part of the design and not purely the appearance. Paragraph 6.31 - spelling mistake - Building for a Healthy Life (BHL) is the latest edition of one of the most widely used design guides used in England and has, as its emphasis, healthy placemaking Paragraph 6.34 - could there be a reference to enhancing the natural environment, not just protecting it. The background paper references an option E in the initial sustainable appraisal screening of options, which does not exist.	Noted. Noted. Polices G1-G6 specifically address the natural environment. Noted. We will update the background papers to support the next consultation stage.	No Action Required Oxford City Action: Review typos No Action Required Oxford City Action: Review background paper

All Public Responses - Draft Policy HD8

Please tell us what you think of policy options set 011e (draft policy HD8): Efficient Use of Land. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	43	13.69%
Agree with Preferred Option	57	18.15%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	14	4.46%
Do not know	8	2.55%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
HD8	Strongly support	Supports the preferred option of a policy requiring development proposals to make the best use of site capacity, in a way that is compatible with both the site itself and the surrounding area, with building heights and massing at least equivalent to the surrounding area. NPPF paragraph 129 sets out that planning policies and decisions should support development that makes efficient use of land. This policy will support intensification of existing employment sites where there is the opportunity to achieve increased scale and density to support economic growth in Oxford.	Support for policy is welcomed.
HD8	Support in principle - Clarification	The Universities and Network Rail support the principle of maximising efficient use of land and maximising capacity, but would draw attention to the final paragraph of the draft policy. It would be helpful to understand how these densities relate to different typologies to ensure these do not inadvertently reduce efficiencies.	There is no reason that setting out indicative minimum capacities should inadvertently reduce efficiencies.

HD8	Design-led approach	The draft policy states that 'very-high density' residential development will indicatively be taken as over 100dph. We acknowledge the reference to 'over' 100dph is a starting point not maximum which is positive in the context of housing need and limited land availability. That said, we remain of the view that it should be clearly expressed within the main policy wording that a 'design-led' approach should be taken, based on the opportunities and constraints of a site and assessment of impacts. It is considered that this is the only approach that is capable of delivering the intention of the policy to 'make efficient use of land and maximise capacity'.	Policy HD7 sets out the requirement for high-quality design.
HD8	Policy requirements when creating	Draft Policy HD8 relates to granting planning permission only where development proposals make efficient use of land and maximise capacity and that sites across the City will be capable of	Allocated sites have their own bespoke policies in the plan, which contain site and context-

Draft policy	Topic	Summary of comments	Response

	new transformative context.	accommodating development at an increased scale and density to their surroundings. In contrast, draft Policy HD9 sets out that planning permission will only be granted for development that will retain the special significance of views of the historic skyline, both from within the historic core area and from outside the historic core area. As per previous written representations, we would encourage further guidance in relation to strategic site allocations and large areas which are planned for intensification and transformation such as the Botley Road Retail Park, which will create a new context because of their size and scale in draft Policy HD8. The Plan should make reference to and recognise the fact that development at strategic sites need to acknowledge existing context but also have the opportunity to create new transformative context.	specific guidance on appropriate type and quantum of development and design requirements – including density.
HD8	Suggested amendments	Car infrastructure, roads, driveways and garages are the single biggest cause of inefficient use of land, occupying space that could be a bedroom or extension, yet this not acknowledged anywhere. Modification proposed: The phrase “<i>is informed</i>” is practically meaningless, as is “<i>does not substantially impact</i>” Remove Para e) “opportunities for net zero carbon design” as it is unrelated to the topic, also remove, f) “flood risk” for the same reason.	Urban design principles were used to determine the indicative density figures. It is a holistic approach that takes into consideration factors that are deemed to be relevant in the context of the built environment. E.g. net zero carbon design may have implications on siting, height, massing etc and flood risk may impact the amount of developable land on a site.

		Should include an exemption for conservation areas.	

Draft policy	Topic	Summary of comments	Response
HD8	Support	The aims of this draft Policy are supported, including building at appropriate densities as it is an important component of sustainable development. Making efficient use of any land in the City is a priority.	Support noted and welcomed.

HD8/ HD9	Conflicting policy requirements	Policy HD8 supports efficient use of land and maximising densities, while Policy HD9 helps protect the setting of Oxford, including its historic skyline, and views into and out from the historic core area. Encourage Local Plan to provide further guidance about how strategic allocations (inc. Osney Mead), can balance these competing policy interests and delivery required benefits and intensification. OUN generally encourages the Local Plan to recognise that largescale redevelopment / regen. projects need to acknowledge the existing context and can also create new transformative contexts.	Policies HD8 and HD9 (HD2 and HD6 in the Submission Draft Plan) do not inherently contradict as it is possible to make efficient use of land/ increase densities while responding to and protecting the historic skyline. Policy HD6 sets out the process and tools which help to limit harm to the skyline from development. Site allocation policies and Area of Focus policies provide clarity around redevelopment opportunities and areas where additional growth is encouraged/ expected. Note the point about further clarity in strategic allocations.
HD8	Should go further	There should be densification outside of the centre as well as inside it. Arterial roads are lined with low-density housing but they are highly accessible and justify an urban scale of development. They should be lined with minimum four-storey blocks of flats and offices with 100dph+ all along them arterial roads (except in conservation areas) not just in the district centres that are along them. Suggest 80dph suburban, 120dph gateways, 200dph centres.	The minimum indicative capacities do represent densification. The character of arterial roads does vary considerably. Some parts of arterial roads, near the ring road, will be gateway sites, but between these and the

Draft policy	Topic	Summary of comments	Response
			centres, very high densities will not always be appropriate. The suggested densities are very high and not considered feasible.
HD8	Object	Stop interfering with development. Do not set minimum densities as they lead to poor design and prevent low densities that may be appropriate. Too many buildings out of keeping with height of surroundings and add to existing problems of infrastructure and amenity. Need to be careful- justified controversy when the University built high-rise buildings that damaged view in and around Port Meadow. The centre brings tourists to Oxford and provides economic benefit, which as it risk if it is allowed to deteriorate further (it is already harmed by increased heights and sizes). Open spaces are important. Green sites should have more retained. This affects density.	The policy does have enough flexibility to allow lower densities if it can be justified that they are more appropriate because of the context of the site. The densities do allow for amenity space, green space, etc.

Statutory Consultee Responses – Draft Policy HD8

South Oxfordshire District Council and Vale of White Horse District Council

Policy/Topic	Summary of Comments	Response	Outcome

HD8 & HD9	We welcome the minimum density targets, which responds to concerns raised by South Oxfordshire and Vale of White Horse. Supporting evidence to justify them is	A background paper explaining the rationale for the densities will be published. Density of course	Background paper explaining densities to be published. Template for site capacity assessments
Policy/Topic	Summary of Comments	Response	Outcome
	needed. HD8 and HD9 may be contradictory as HD9 may restrict density in key locations.	is never unlimited and should always be design-driven.	to be shared ahead of next consultation stage.

Historic England

Draft Policy	Summary	Response	Outcome

HD8	Strongly encourage more nuanced wording in the opening paragraph of HD8. Background paper 11 summarises the preferred option as “Require that proposals make the best use of site capacity, taking into account the surrounding area, building heights, massing and other contextual factors such as heritage and green infrastructure”. While this is a reasonable description of HD8 in OLP 2040, the policy’s emphasis has changed in OLP 2042. There may be circumstances where the expectation as stated in the revised policy, especially regarding scale, will not be realistic. Some form of caveat is needed. We suggest adding “most” to the opening paragraph.	We agree with the comment in general and will update the wording, though would propose slightly different wording.	Policy updated.

Oxfordshire County Council

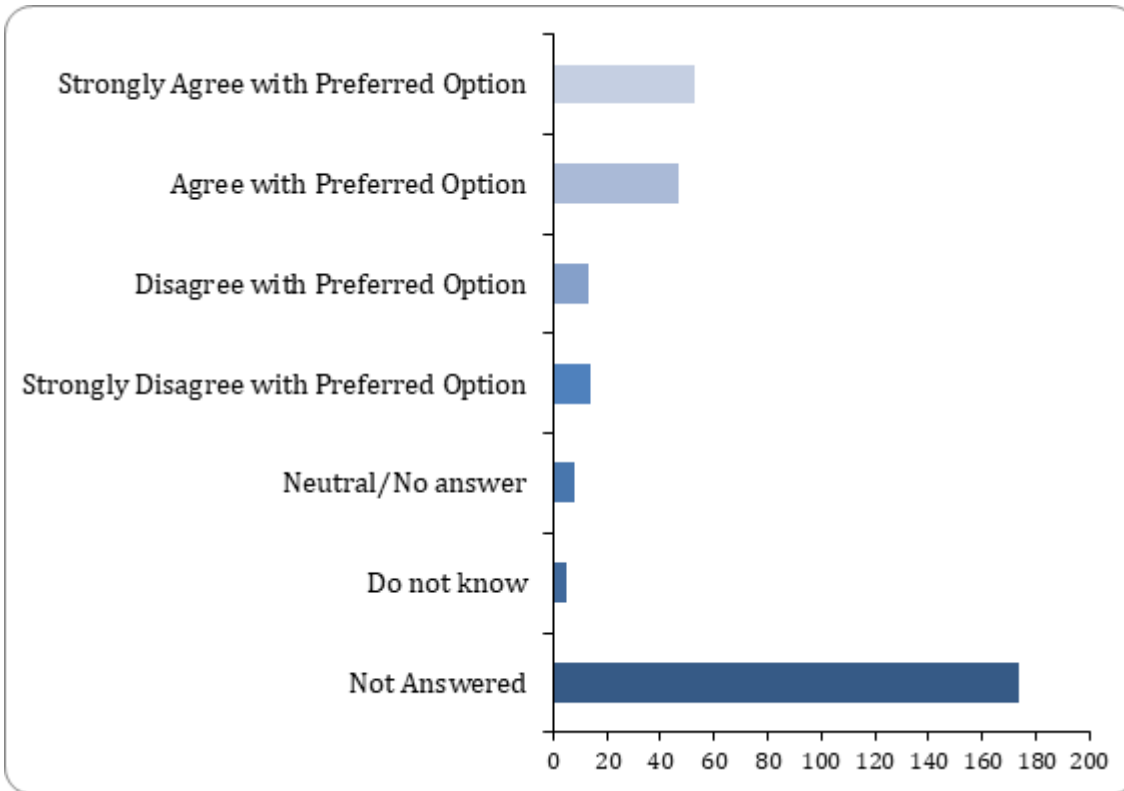
Policy/Topic	Summary of Comments	Officer Response	Outcome

Policy HD8 Making Efficient Use of Land	Strategic Planning This policy approach is supported by the County Council as it will help reduce the unmet housing need identified in the plan. The approach to densities in a hierarchical manner depending on accessibility is welcomed as it should reduce reliance on private vehicles and increase access to sustainable modes of transport.	Noted.	No Action Required
	It is important however, to make it clear that this policy works in tandem with draft Policy HD7 and the principles included in Appendix 1.1. We encourage the City Council to make explicit reference to this, to ensure high quality developments.	We do not propose to make an explicit reference in the plan to that effect. The plan should be read as a whole and relevant policies applied in the decision-making process.	No Action Required
	Urban Design (Placemaking) Paragraph 6.36 - 'Transport hubs generally enable a greater density to be assumed.' - The same should apply to areas with key services such as hospitals, education, leisure/shopping - not just transport. Generally, people want to live near services, therefore there will be a greater demand for housing, increasing density.	Noted.	No Action Required

All Public Responses - Draft Policy HD9

Please tell us what you think of policy options set 011f (draft policy HD9): Views and Building Heights. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	53	16.88%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	13	4.14%
Strongly Disagree with Preferred Option	14	4.46%
Neutral/No answer	8	2.55%
Do not know	5	1.59%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
HD9	Support but VuCity requirement should be deleted	The aims of policy HD9 in terms of the impact of development upon views into and out of the City are acknowledged and supported by Mansfield College and ONV. However [the policy] requires the use of specific software (VuCity). It is not appropriate for a Local Plan to push a particular brand of software. This puts undue costs onto projects especially where an alternative modelling software is already being used by the applicants. This reference should be deleted, and the policy simply refer to the use of an appropriate 3D model. However, it is welcomed that the Council has introduced an acknowledgement that the software model may change over time.	The LPA has a licence with VuCity software to view the submitted 3D models. Alternative or generic software may not be compatible with the Council's systems which is why the policy is specific in its requirement for VuCity.

HD9	Rewording to reflect NPPF	Previous representations submitted on behalf of ORVIL in response to the Reg 19 consultation on the LP2040) states that Policy HD9 should be revised to reflect the NPPF and the guidance as set out in GLVIA 3rd edition. It is acknowledged that (part e) of the draft policy references this guidance. However, it is considered that replacing ‘special significance’ in the first paragraph of the policy with ‘important characteristics’ would more appropriately respond to this guidance. It is considered that the word ‘bulk’ should be removed from the following sentence ‘Development above this height must be limited in bulk and must be of the highest design quality’. The meaning of the word bulk can be overly interpreted, and it is considered unhelpful to include within the policy. Removal of the word ‘bulk’ does not dilute the intention of the policy due to the supporting explanatory paragraphs. Objection 2:	Views into and from within the city are important elements of the setting of heritage assets. The collection of buildings that make up the ‘dreaming spires’ are considered a heritage asset in their own right, and they do have special significance. There is sufficient detail in the supporting text that provides clarity to the policy. The word ‘bulk’ is considered to be vital to the policy, and its removal does not add to clarity, but would lead to greater potential for harm. It is a design term that will be used in the

Draft policy	Topic	Summary of comments	Response

		It should be made clear within the policy that a view is not itself a heritage asset and does not have significance in the same way a heritage asset does, as defined in the NPPF. It is considered that replacing 'special significance' in the first and sixth paragraphs of the policy with 'important characteristics' would appropriately respond to the guidance set out in GLVIA 3rd edition. It is also considered that 'limited in bulk and must be' should be removed from the following sentence 'Development above this height must be limited in bulk and must be of the highest design quality'. The meaning of these words can be overly interpreted and it is considered unhelpful to include within the policy. Removal of the words does not dilute the intention of the policy due to the supporting explanatory paragraphs and text which sit alongside policy HD9.	assessment of planning applications.
HD9: Views and building heights	Setting of View Cones	The policy states that planning permission will not be granted for development proposed 'within a View Cone or the setting of a View Cone' if it would harm the special significance of the view. The use of the term 'setting' is problematic, as the NPPF defines 'setting' as the surroundings in which a heritage asset is experienced but View Cones are not designated heritage assets. They are intended to manage townscape character and safeguard settings of heritage assets visible within them. Reference to setting should be changed to 'townscape' or 'landscape context'.	Views into and from within the city are important elements of the setting of heritage assets. The collection of buildings that make up the 'dreaming spires' are considered a heritage asset in their own right, and they do have special significance. There is sufficient detail in the supporting text that provides clarity to the policy.
HD9: Views and	Harm to View Cones	The policy does not allow harm to the special significance of a view, but it should allow assessment of level of harm outweighed against benefits.	The policy sets out guidance to inform design decisions about heights and to enable an

Draft policy	Topic	Summary of comments	Response
building heights			understanding and detailed assessment of the impact of heights.
HD9	Policy too rigid	The rigid height thresholds and extensive assessment requirements across all sites should be reviewed as this approach may restrict good design and sustainable development, especially in less sensitive areas.	There are no rigid height thresholds set out in the policy at all. The assessment requirements are proportionate and are most extensive for only specific circumstances.
HD9	Support for policy	We welcome this Policy's intention to 'retain the special significance of the historic skyline' of Oxford. However we are concerned that, as currently written, the Policy places almost exclusive emphasis on views of the Historic Core Area. ... The Policy should explicitly prohibit such high buildings that would impinge on the skyline from Port Meadow, in order to ensure there is no repeat of the Castle Mill flats disaster and the more recent spoiling of Port Meadow views by the tall buildings at Oxford North.	The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. Although the policy is in several parts, it is considered that this is clear, especially as the second part starts 'Applications for any building that exceeds 15m...'

HD9	Support in principle	We worked closely with the city council and other specialists to create the 'Assessment of the Oxford View Cone' Report in 2015, we strongly support reference to this report within the policy text. We are also pleased to see that reference is made to the view cones but also the wider setting of the views. This makes it clear that the 10 view cones do not provide a definitive list of all the views, and that the wider setting, or even views that do not fall within the 10 'official' view cones can also be sensitive and warrant a high level of protection.	Policies HD1 and 2, in particular (HD3 in the Submission Draft Plan), do carefully consider the setting of heritage assets and may also be of relevance, alongside Policy HD9.

Draft policy	Topic	Summary of comments	Response
		The policy, or its supporting text, also needs to be clear on the difference between 'views' and historic 'setting'.	
HD9	Objection	Policy is ineffective as it only appears to refer to central Oxford and the dreaming spires, not views for example into, and out of the Old Headington Conservation area. The language needs to be clearer that it applies to ALL of Oxford where views exist either in or out. See also Ruskin Field SPE19.	The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. Although the policy is in several parts, it is considered that this is clear, especially as the second part starts 'Applications for any building that exceeds 15m...'

HD9	Inconsistent with national policy	The preferred option for this policy states that 'Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view'. Under the terms of the policy, all levels of harm are unacceptable, regardless of the level of harm and the extent of any benefits which may outweigh that harm. This is inconsistent with national planning policy, in that it does not enable a balancing exercise to be undertaken. We would ask the Policy to be rebalanced.	The policy sets out guidance to inform design decisions about heights and to enable an understanding and detailed assessment of the impact of heights.
HD9: Views and building heights	Setting of View Cones	The policy states that planning permission will not be granted for development proposed 'within a View Cone or the setting of a View Cone' if it would harm the special significance of the view. The use of the term 'setting' is problematic, as the NPPF defines 'setting' as the surroundings in which a heritage asset is experienced but View Cones are not designated heritage assets. They are intended to manage townscape character and safeguard settings of heritage	Views into and from within the city are important elements of the setting of heritage assets. The collection of buildings that make up the 'dreaming spires' are considered a heritage asset in their own right, and they do have special significance. There is
Draft policy	Topic	Summary of comments	Response
		assets visible within them. Reference to setting should be changed to 'townscape' or 'landscape context'.	sufficient detail in the supporting text that provides clarity to the policy.

HD9: Views and building heights	Harm to View Cones	The policy does not allow harm to the special significance of a view, but it should allow assessment of level of harm outweighed against benefits.	The policy sets out guidance to inform design decisions about heights and to enable an understanding and detailed assessment of the impact of heights.
HD9	Policy too rigid	The rigid height thresholds and extensive assessment requirements across all sites should be reviewed as this approach may restrict good design and sustainable development, especially in less sensitive areas.	There are no rigid height thresholds set out in the policy at all. The assessment requirements are proportionate and are most extensive for only specific circumstances.
HD9	Support for policy	We welcome this Policy's intention to 'retain the special significance of the historic skyline' of Oxford. However we are concerned that, as currently written, the Policy places almost exclusive emphasis on views of the Historic Core Area. ... The Policy should explicitly prohibit such high buildings that would impinge on the skyline from Port Meadow, in order to ensure there is no repeat of the Castle Mill flats disaster and the more recent spoiling of Port Meadow views by the tall buildings at Oxford North.	The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. Although the policy is in several parts, it is considered that this is clear, especially as the second part starts 'Applications for any building that exceeds 15m...'

Statutory Consultee Responses – Draft Policy HD9

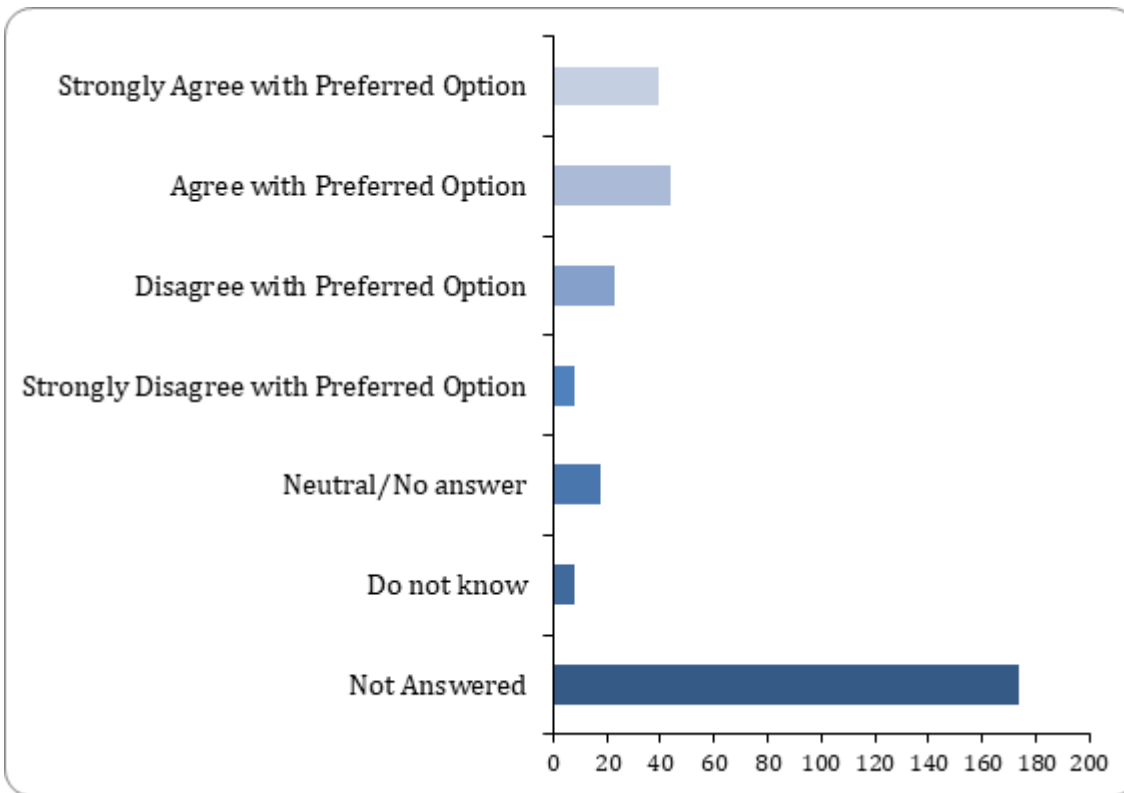
Oxfordshire County Council

Policy/Topic	Summary of Comments	Officer Response	Outcome
Policy HD9 Views and Building Heights	Urban Design (Placemaking) Paragraph 6.39 - Make reference to the view cones.	View cones are referenced in paragraphs 6.45-6.47.	No Action Required
	Paragraph 6.47 - assuming views outside of Oxford City boundary do not extend into other districts besides Vale of White Horse? If not, reference other districts too.	Some views extend out of the city (e.g., Boar's Hill, Raleigh Park and Elsfield). Although the view may extend beyond the city boundary, the policies in the plan only apply with Oxford's administrative area.	No Action Required

All Public Responses - Draft Policy HD10

Please tell us what you think of policy options set 010a (draft policy HD10): Health Impact Assessments. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	39	12.42%
Agree with Preferred Option	44	14.01%
Disagree with Preferred Option	23	7.32%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	18	5.73%
Do not know	8	2.55%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
HD10	Objection – Not in line with NPPF	Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities - not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources. A report "" Healthier and Happier An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder. For the future plan to be in line with national policy and effective, the following wording should be included within the policy: <i>"Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment".</i>	The requirement for HIAs for all major development proposals is not at odds with the benefits associated with Older Persons' Housing. No changes are required.

HD10 (HIAs)	General comment	The inclusion of a health impact assessment sounds great, but it should be made clear not just what should be included in an HIA, but how the information is to be used. Oxford is very short of space. If	As set out in the last paragraph of the policy, additional information

Draft policy	Topic	Summary of comments	Response
		HIAs are to be used e.g. to push through developments which conflict with national policy in disadvantaged or working-class areas, then this is not a good thing. These can be huge documents. If they increase the volume of paper that councillors and residents have to plough through, it is important to clarify both their scope and their role.	and guidance can be found in the appendices and within the TAN.
HD10	Several comments against including a policy	Several comments saying they don't agree with including a policy and one saying there are already lots of health-related tests as part of the plan and a HIA is an additional level in the way of development	The HIA is not overly onerous, but helps focus on health impacts. Creating a healthy places is fundamental, and overarching, so this focus is important.
HD10	General comment	The inclusion of a health impact assessment sounds great, but it should be made clear not just what should be included in an HIA, but how the information is to be used. Oxford is very short of space. If HIAs are to be used e.g. to push through developments which conflict with national policy in disadvantaged or working-class areas, then this is not a good thing. These can be huge documents. If they increase the volume of paper that councillors and residents have to plough through, it is important to clarify both their scope and their role.	HIAs do not need to be extensive, but bring together elements of a proposal to show how they work together to impact health, and help show when any mitigations are needed.

HD10	HIA policy scope too wide.	The HBF would agree that they are an essential part of plan making to ensure the Council understand the health outcomes it is seeking to achieve and creates a plan that seeks to deliver these. This should be achieved through the preparation of a whole plan HIA which will inform the Council that the policies it contains address the key health outcomes for the area. As the plan and the policies, it contains has been prepared to address the key health issues it is therefore unnecessary for future development proposals that accord with this plan to undertake a separate HIA. If a development meets the	HIAs submitted in support of major development proposals will contain specific details relevant to the proposal which are in addition to the general overarching requirements of the Local Plan as a whole.
Draft policy	Topic	Summary of comments	Response
		policies in the plan, then it is by default addressing the health outcomes already identified by the Council. An HIA as part of the application would merely be repetition of the work the council has already undertaken. The only circumstance where an HIA may be appropriate would be for a larger unallocated site where the impacts may not have been fully considered by the council as part of the plan wide HIA.	

HD10	Objection	Policy is not effective. The policy as drafted requires an assessment however it does not set a target for compliance. It is not clear how this is to be implemented (e.g., health impacts from increased traffic, loss of green space etc.).	As set out in the last paragraph of the policy, additional information and guidance can be found in the appendices and within the TAN. The TAN states “Planning officers will refer to Appendix 3 of the Oxfordshire HIA toolkit when assessing the submitted HIA report to ensure it adequately addresses all relevant health determinants.”

Statutory Consultee Responses – Draft Policy HD10

Oxfordshire County Council

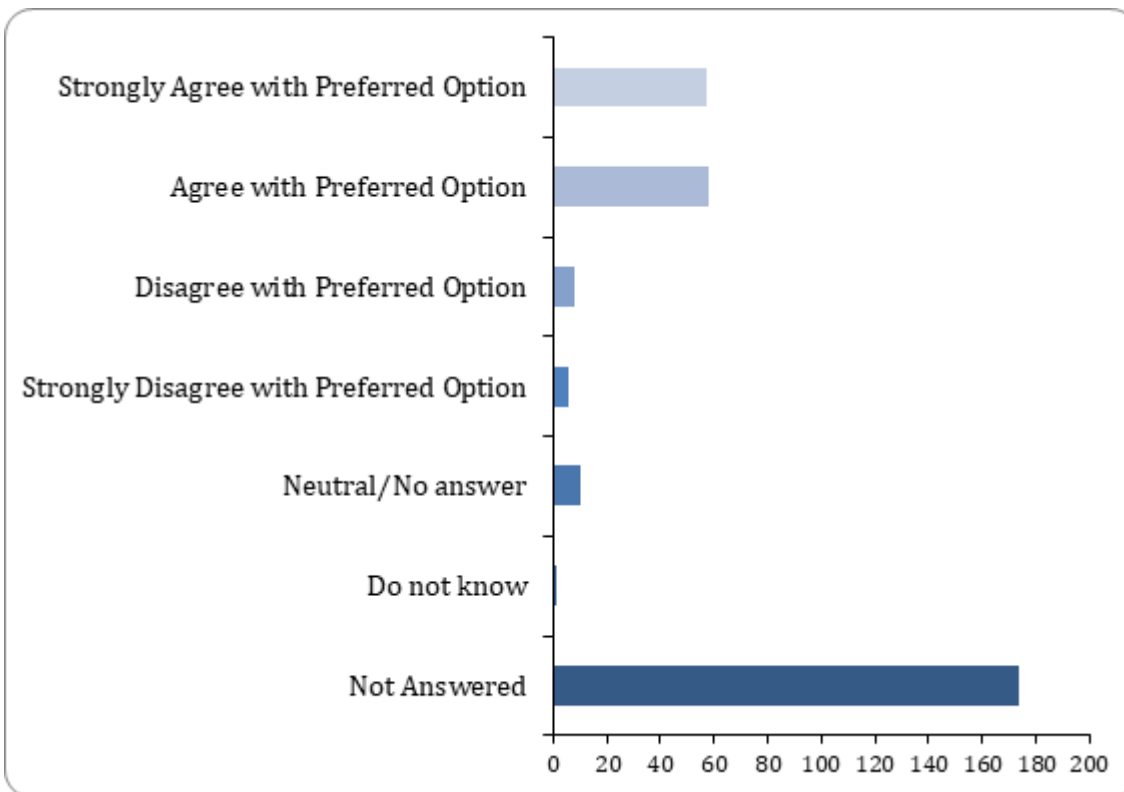
Draft Policy	Summary	Response	Outcome
Policy HD10	Public Health		

Health Impact Assessments	Health Impact Assessments needs to be specific on the threshold for triggering the need for a developer to conduct an HIA. For example, requiring all developments which include 50 or more residential units, or over 1,000sq.m if commercial, to do an HIA, as is the case in Birmingham's Local Plan. This helps to remove any ambiguity over whether or not a development requires an HIA and should actually remove some of the extra burden that has been outlined as a potential negative consequence of this approach in the SA. As such, Option A is our preferred approach for this policy, on the basis that formal thresholds are included.	Policy HD10 requires an HIA to be submitted as part of major development proposals. Major developments (as defined in the NPPF,) are developments of 10 or more dwellings or 1,000sqm or more nonresidential floorspace. Major development is not currently defined in the Glossary of the Local Plan	Oxford City Action: Consider whether Local Plan glossary should also include a definition of 'major development'

All Public Responses - Draft Policy HD11

Please tell us what you think about policy options set 010b (Draft Policy HD11): Privacy, Daylight and Sunlight. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	57	18.15%
Agree with Preferred Option	58	18.47%
Disagree with Preferred Option	8	2.55%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	10	3.18%
Do not know	1	0.32%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
HD11	General comment	This policy should address dual aspect to provide shade. We consider a problem here is the insistence on little bits of garden for individual houses means that the quality of space is inevitably really limited. A greater emphasis on community living and shared spaces would enable a greater density with a much better quality of life. This is another reason to encourage the greater involvement of community land trusts.	Policy HD13 (HD10 in the Draft Submission Plan) supports shared outdoor amenity space. Assessments of daylight and sunlight which follow BRE guidance include shade (overshadowing) and dual/ single aspects openings.
HD11	Policy unnecessary	Building Regulations and existing BRE guidance already secure reasonable daylight, sunlight and privacy for homes, while employers have clear incentives (and statutory duties) to provide acceptable working conditions. Extending a prescriptive local test to offices, labs and healthcare buildings would add another consultancy layer— modelling, section diagrams, over-shadowing studies—without materially improving welfare, but it would raise costs, lengthen determinations and make the compact, mid-rise schemes Oxford needs harder to finance. A flexible, performance-based approach— using national benchmarks where issues genuinely arise—will protect amenity while keeping land available for the new homes and workspaces the city sorely lacks.	The policy requirements will relate specifically to residential development and sensitive workplaces such as schools. It is not intended to apply to most employment sites, and the reference to sensitive uses and potential safeguarding issues is considered to be clear enough.
HD11	Too limiting	I'm concerned that this would limit density too much.	High densities can be achieved that still create decent homes with amenity space. When pushing density, these policies are even more important.

HD11	Green spaces and density	[Include] access to green spaces	Provision of green spaces is addressed in other policies (e.g. G2, G3)

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Statutory Consultee Responses – Draft Policy

HD11

No statutory consultee comments on draft policy HD11.

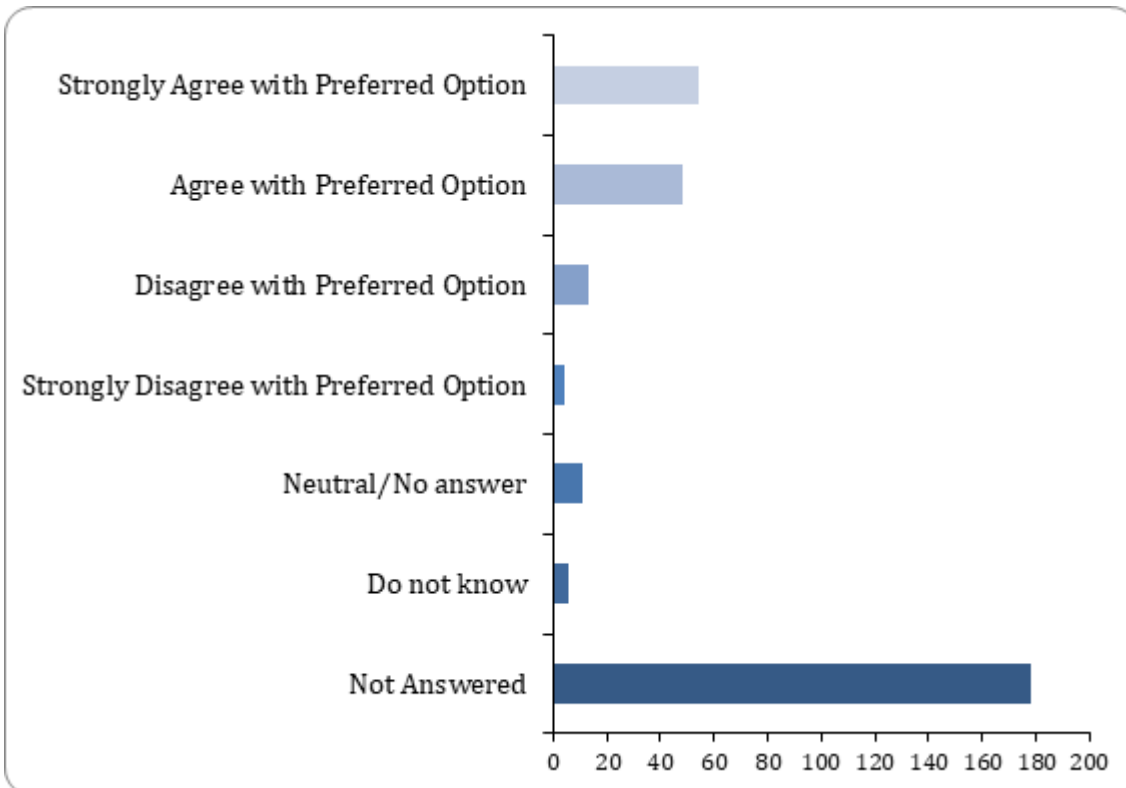
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All Public Responses - Draft Policy HD12

Please tell us what you think about policy options set 010c (draft policy HD12): Internal Space Standards for Residential Buildings. If you have any additional comments please put them in the comment box.

There were 136 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	54	17.20%
Agree with Preferred Option	48	15.29%
Disagree with Preferred Option	13	4.14%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	11	3.50%
Do not know	6	1.91%
Not Answered	178	56.69%

Draft policy	Topic	Summary of comments	Response
HD12	No policy	Do not apply national space standards in oxford. A substandard small bedroom must be better than being on the streets or in a hotel. The layout of some houses does not allow change to make rooms up to size. Do not interfere. Push prices upward, limiting choice for singles, key workers and students who may prefer a smaller studio.	This applies to new development. The pressing housing need does not justify poor standards of accommodation, and the standards are applicable to a range of tenure types.
HD12	More space is needed	In communal areas- fixed seating and wider area of corridor or lobby space is not enough to support community living. Bigger and better planned shared spaces are needed. Expectation of remote working, need for study space, teenagers need more space.	Space standards are set nationally.
HD12	Ensure doesn't deter building	Support but must not deter building	The policy approach has been included in the whole-plan viability testing.

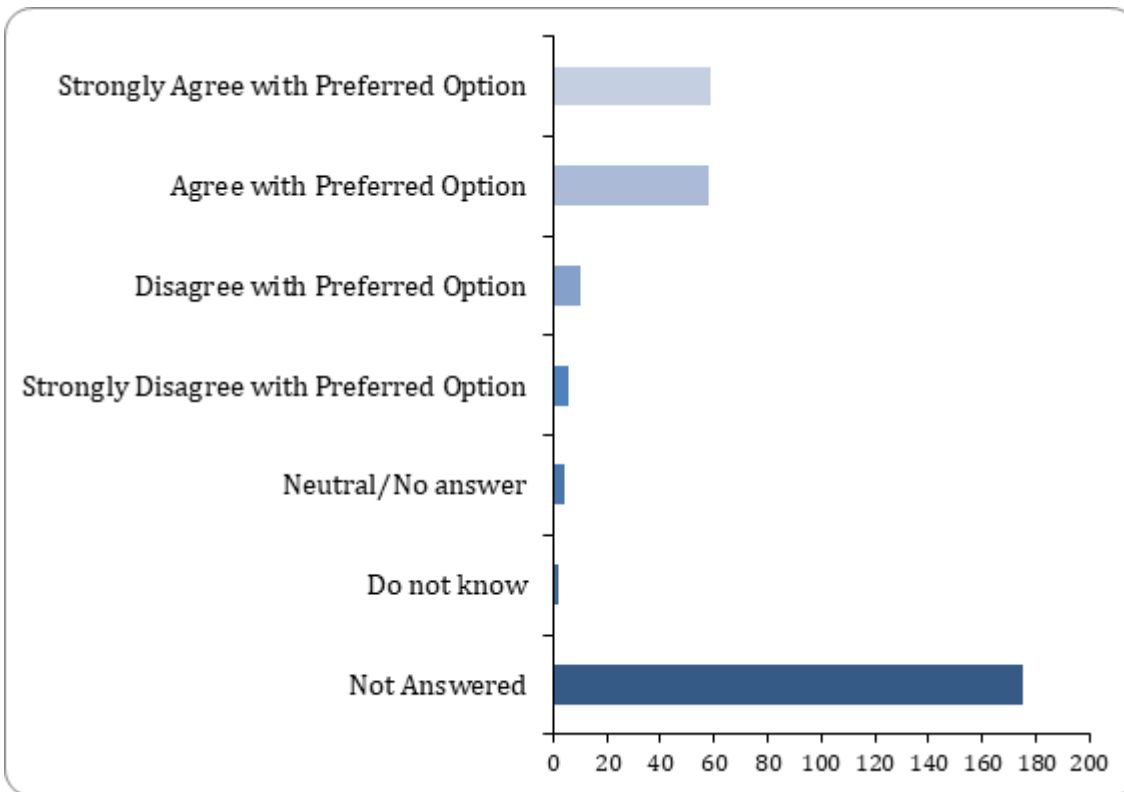
Statutory Consultee Responses – Draft Policy HD12

No statutory consultee comments on draft policy HD12.

All Public Responses - Draft Policy HD13

Please tell us what you think about policy options set 010d (draft policy HD13): Outdoor Amenity Space. If you have any additional comments please put them in the comment box.

There were 139 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%
Agree with Preferred Option	58	18.47%
Disagree with Preferred Option	10	3.18%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	4	1.27%
Do not know	2	0.64%
Not Answered	175	55.73%

Draft policy	Topic	Summary of comments	Response
HD13	Support for policy	Support especially where high density and built up areas like Oxford	The support is welcomed.
HD13	Support with suggested amendment	CPRE support this policy and seek that communal food growing space is specifically encouraged within this policy.	Criterion f) states: “for communal spaces that there is a variety of space, including provision of space to sit and to play, and that space is adaptable to the changing needs of residents, being easy to maintain with resilient materials, but with opportunities for communal gardening or food growing.”
HD13	Clarity over how the policy relates to student accommodation	The policy appears to apply for purpose-built student accommodation, but it does not offer detailed clarity of what ratio is expected, and what other factors (elements d-i) might be applied to the policy specific to student accommodation.	The Policy (HD10 in the Submission Draft Plan) does not apply to student accommodation.
HD13	General comment	This draft policy requires minimum levels of outdoor amenity space provision. This includes 1 and 2 bedroom apartments which are expected to provide either a private balcony or terrace or have direct and convenient access to a private or shared outdoor space.	Noted comment.
HD13	Require policy for non-resi	Set a requirement for outdoor amenity space for larger non-resi development	There are requirements for greening, but public spaces won't always be practical or

Draft policy	Topic	Summary of comments	Response
			outside space, even in tall blocks of flats.
HD13	Against policy	Believes the need for housing is greater than amenity space	Requiring amenity space should not compromise developments coming forward, but will ensure they are decent places to live.
			compatible with non-resi developments.
HD13	Concerns about policy long-term	Having little individual bits of gardens means that the quality of space is inevitably really limited and there should be a greater push for shared spaces	This level of detail is dependent on the design and vision for the development.
HD13	Concerns about balconies	Don't think balconies should be counted towards space – they're too cramped	Balconies have the advantage of providing direct access to private

Statutory Consultee Responses – Draft Policy HD13

Oxfordshire County Council

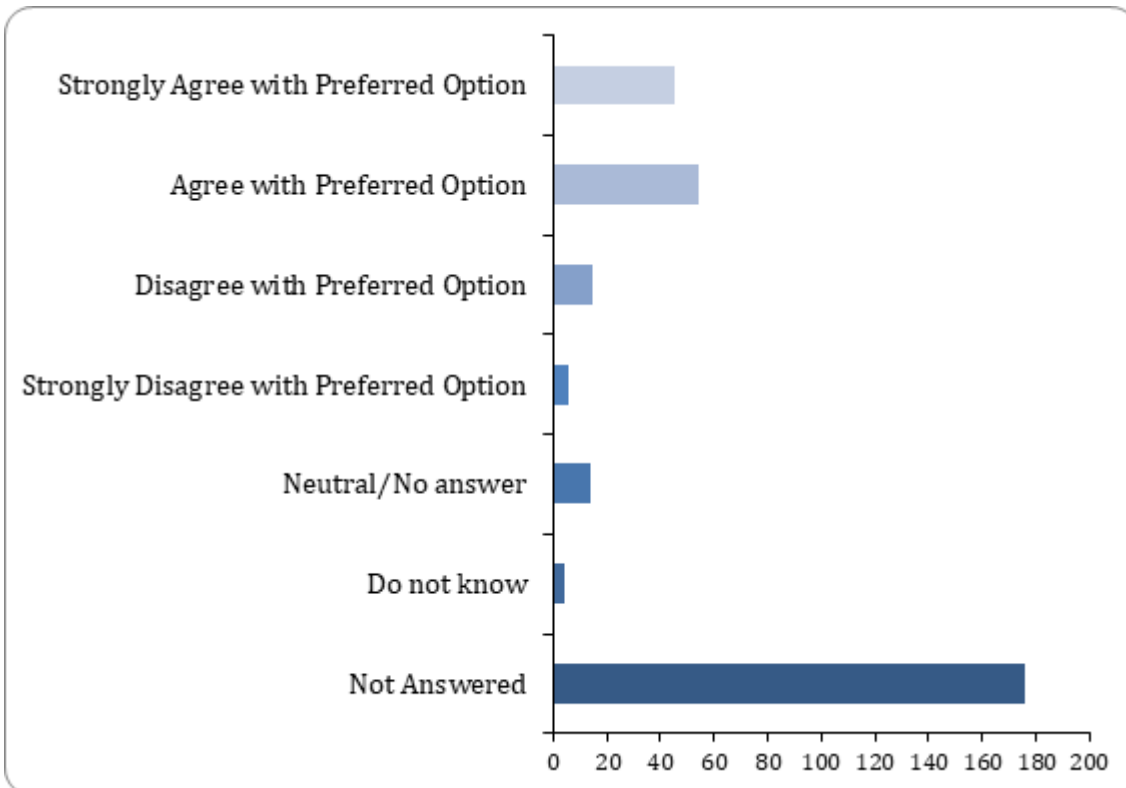
Policy/Topic	Summary of Comments	Officer Response	Outcome

Policy/Topic	Summary of Comments	Officer Response	Outcome
	Understanding and addressing the health risks of damp and mould in the home - GOV.UK		
Policy HD13	Public Health This policy wording currently only includes drying space for houses, flats and maisonettes of three or more bedrooms. It needs to make it explicit that even in cases where smaller properties (e.g. one/ two-bedroom flats) are unable to have private outdoor space for clothes drying, that adequate communal drying space will be provided. The Gov.uk website has provided some guidance on how to reduce potential indoor air quality issues through the provision of drying space:	We consider that the policy as drafted is sufficient and supports a proportionate amount of outdoor space based on proposed property sizes.	No Action Required

All Public Responses - Draft Policy HD14

Please tell us what you think about policy options set 010e (draft policy HD14): Accessible and Adaptable Homes. If you have additional comments please put them in the comment box.

There were 138 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	54	17.20%
Disagree with Preferred Option	15	4.78%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	14	4.46%
Do not know	4	1.27%
Not Answered	176	56.05%

Draft policy	Topic	Summary of comments	Response
HD14	M4(3) does not remove need for specific older persons' housing.	It is common for Local Authorities to conflate the needs of wheelchair users with the needs of older people in the community. Although adaptable and accessible housing can assist it does not remove the need for specific older persons' housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing.	Policy HD14 (HD11 in the Submission Draft Plan) works together with other policies, including Policy H12, which sets criteria for older persons accommodation

HD14	Should go further	Those requiring accessibility arrangements shouldn't be restricted to affordable housing. We also recommend that 10% of new homes are built to the M4(3) standard across all tenures to meet current and future disability needs. Where exceptions are allowed, accessible accommodation must be provided on the ground floor. All multistorey buildings should be accessible by lift, especially if social housing. It's discriminatory to restrict those with a physical disability to live on the ground floor. The standards are essential to ensure inclusive, future-proof homes that support aging in place. Therefore 100% should be M4(2) and 10% M4(3), recognising the critical shortage currently. This supports inclusive communities but also reduces long-term costs that may otherwise fall to the local authority- e.g. stairlift installation about £6,000 cheaper. The local plan could also help address disabled people's housing needs by requiring planning teams to track the number of homes given planning permission to one or other of the higher level accessibility standards. This will help to establish and track delivery which in turn will assist future strategic planning.	The Planning Practice Guidance¹ is clear that local plan policies for wheelchair user homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The PPG is also clear that requirements are based on local need. The exceptions criteria do require that option to use the ground floor is fully explored.

Draft policy	Topic	Summary of comments	Response
HD14	Do not have policy	Rely on NPPF	The NPPF does not set any specific requirements/thresholds for Oxford.
HD14	Viability	As per comments already made in respect of viability, it is currently unclear if the M4(3) standard requirements are viable for older persons housing and we recommend that the council update the study and provide clarification on the testing undertaken for sheltered and extra care housing. Lifts, wider corridors, reinforced bathrooms- adds £8-10k per flat and potentially reduces number of units. Price out the households the policy aims to help.	The policy approach has been considered in the whole-plan viability testing.

Statutory Consultee Responses – Draft Policy HD14

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome

Policy HD14	Housing Services / Public Health		
Accessible and Adaptable homes	We appreciate the recognition in the supporting text to Policy HD14 that homes need to be built with the flexibility to be adapted to the changing needs of residents. The policy requirements include 100% of affordable dwellings and 15% of market dwellings on major sites being constructed to the Category 2 standard as set out in the Building Regulations Approved Document M4. There are some further requirements to a higher level in the policy, as well as exceptions identified. The City	Noted. We will consider suitable wording to ensure the continued application of the policy should changes in Building Regulations arise.	Oxford City Action: Ensure wording is futureproofed for changes in legislation

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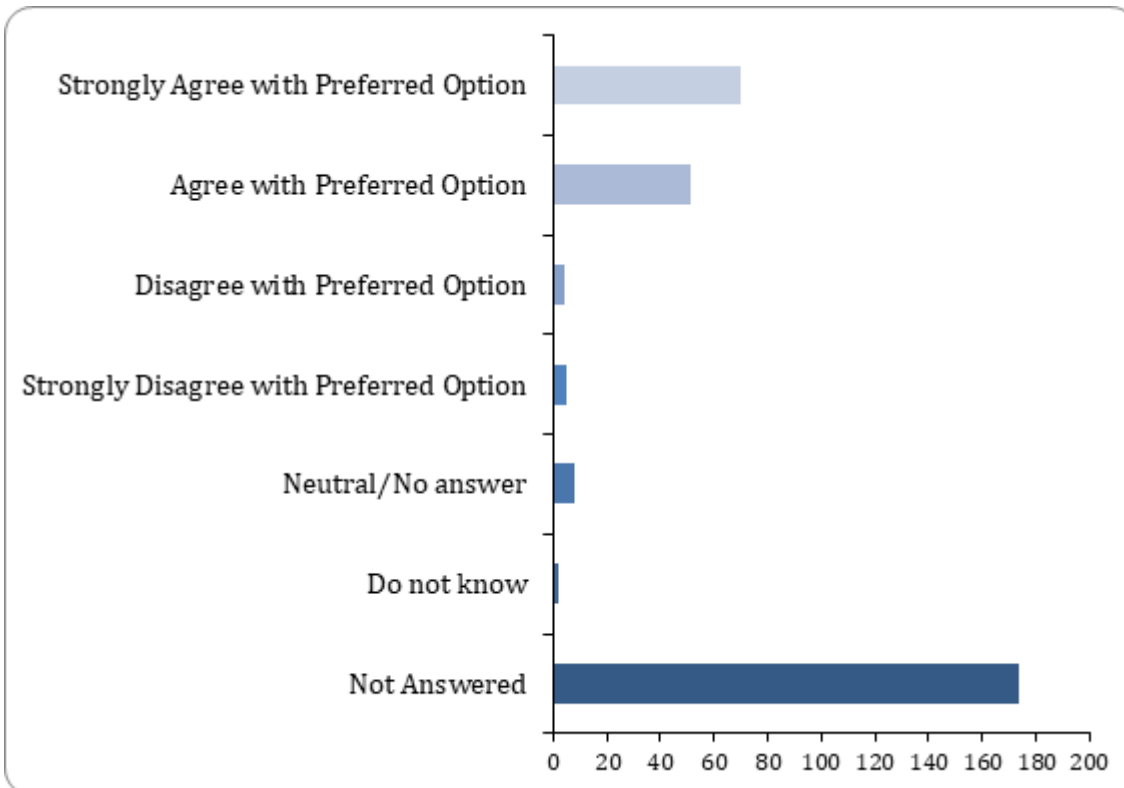
Draft Policy	Summary	Response	Outcome

	Council needs to be confident that even if the Building Regulations change, that the requirements of the policy will still apply. The County Council wants to see 'lifetime homes' built to the maximum extent possible so that people do not need to enter the care sector prematurely. The County Council does not wish to see more care homes built in Oxford City.	Noted. In this instance we assume that you are referring to accommodation with 24/7 care rather than extra care housing, i.e., self-contained on-site homes with on-site care available as required.	No Action Required No Action Required

All Public Responses - Draft Policy HD15

Please tell us what you think about policy options set 011g (draft policy HD15): Bin and Bicycle Stores and External Servicing Features. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	70	22.29%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	4	1.27%
Strongly Disagree with Preferred Option	5	1.59%
Neutral/No answer	8	2.55%
Do not know	2	0.64%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
HD15	Parking and Bike Parking TAN	TAN 12 (Parking and Bike Parking), dated 2022, is now outdated; Cyclox submitted evidence of best practice in 2024 at the request of Cllr Louise Upton to support its update. Key issues that need addressing include the types of cycle stands, appropriate spacing, and the need to locate cycle parking on the carriageway rather than the pavement. Policy HD15 should cross-reference the cycle parking standards in Appendix 7.4, which itself requires revisions to align with LTN 1/20, as outlined in Policy C7.	Updated policy implementation text to reference Appendix 7.4 and TAN.
HD15	Supportive	Divinity Road Area Residents Association support this policy.	Noted and welcomed.
HD15	Non-interference	Asking Council not to interfere with private property.	Noted

Statutory Consultee Responses – Draft Policy HD15

Oxfordshire County Council

Policy/Topic	Summary of Comments	Officer Response	Outcome

Policy HD15	Transport Strategy		
Bin and Bike Storage	There is an opportunity to reference accessibility by exploring solutions to improve the street space and public realm. It is worth noting that the County is working on a Street Design Code which will incorporate a Kerbside	Noted. Once published (and adopted), we can consider inclusion of relevant	No Action Required Oxford City Action: Watching brief for County studies publication

Policy/Topic	Summary of Comments	Officer Response	Outcome
	Strategy, this will incorporate street design, and we would welcome reference to this. For officers' knowledge it is anticipated this will be approved later this year or early next year. Suggested additional wording for second bullet point on page 148: Servicing features can create a cluttered appearance: <u>impacting</u> movement and accessibility	references to supporting strategies produced by partner authorities. Suggested changes proposed are to a bullet point relating to policy	

	and detract from the design of the development, but they can sometimes be designed as an integrated element of the architecture that can contribute positively to the overall design of the buildings or development <u>and not</u> impinge on movement and accessibility. Detailing of these features can be an important contributor to the character of the area.	considerations rather than to the policy itself. No changes proposed to policy text.	No Action Required
Policy/Topic	Summary of Comments	Officer Response	Outcome

	Public Health To maximise modal shift and encourage more people to cycle, cycle storage needs to be located as conveniently as possible. In many cases, this should be at the frontages of homes, or close to building entrances. We echo this statement for charging points for E-cycles.	Noted.	No Action Required

All Public Responses to the Whole of Chapter 6

Draft Policy	Topic	Summary of Comments	Response
All policies	Supportive	CycloX support all policies in this chapter	Noted, support welcomed.

All Policies	Objection	All policies in this section confuse method with targets, are ineffective and fluffy, and where not just regurgitate the NPPF so are pointless.	The policies regarding heritage need to clearly comply with the NPPF, but attempts have been made to make them Oxford-
Draft Policy	Topic	Summary of Comments	Response
			specific. Other policies do reflect Oxford's specific needs.
HD1-HD9	Supportive	We strongly support these policies. Like those on green infrastructure, they should be given very strong weight in recognition of the outstanding heritage importance of the city as a whole and the contribution made by individual historic assets including many non-designated historic assets.	Noted, support welcomed.

Chapter 7 – A Liveable City with Strong Communities and Opportunities for All

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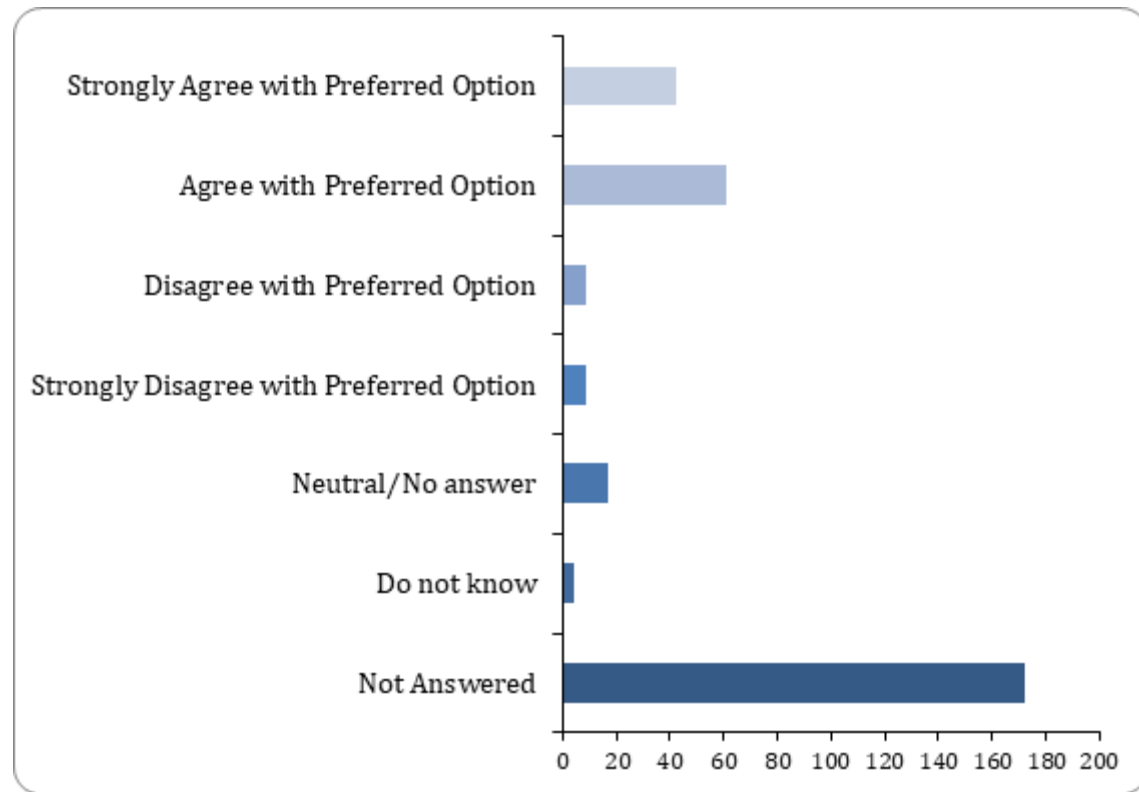
Headlines for Chapter 7:

- Reinvigoration of the City Centre, particularly support for more specialist shops and less empty retail spaces
- City centre needs a community-based club providing leisure, sports facilities and third spaces for families and young people
- More pedestrian, cycle and wheel infrastructure needed
- New homes need to be within walking distance of retail and services
- Developers must be required to include cycle racks
- Some disagreement with the removal of mandatory parking spaces in new developments
- Developers need to be encouraged to provide EV charging in new residential dwellings

All Public Responses – Draft Policy C1

Please tell us what you think of policy option set 013a (draft policy C1): Focusing Town Centre Uses in existing centres.

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	42	13.38%
Agree with Preferred Option	61	19.43%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	9	2.87%

Neutral/No answer	17	5.41%
Do not know	4	1.27%
Not Answered	172	54.78%

Draft policy	Topic	Summary of comments	Response
C1	More homes in centres	Policy should encourage homes, e.g. above shops/other businesses.	Policy C2 makes it clear upper storeys may be used for housing.
C1	List of facilities for town centres	It is noted that 'community facilities' are referenced, but not specifically uses pertaining to education and learning. Templars Square currently includes existing education and learning facilities, therefore, these uses should be included as suitable.	The policy is about where new Use Class E and other main town centre uses will be permitted, and education and learning facilities do not fall into these categories, but it is not to say they won't be permitted in these locations.
C1	Do not separate town centre uses by type or location	A more flexible policy that encourages a mix of uses across different centres and does not limit student accommodation/hotels to the larger centres would better support community cohesion.	The local centres are not generally considered suitable locations for new student accommodation.
C1	Hierarchy of Centres	In broad agreement with the hierarchy of centres defined in the Plan. However, the city centre should be differentiated from the District Centres as the highest order centre in the hierarchy.	There is not a difference between what would or wouldn't be permitted in the city centre compared to the district centres, so there is no need for the differentiation.

C1	Out of centre development	Where out of centre development is proposed, the implications of its comparative accessibility by non-sustainable modes of transport should be included as a policy criterion and reflected in	The policy does require that, if an out of town location is justified by the sequential test it must then

Draft policy	Topic	Summary of comments	Response
		the assessment of its impacts on the city centre. If a higher level of dedicated parking provision is deemed necessary than for equivalent uses in the city centre, then this should be identified as a conflict with Draft Policy C8 (Motor Vehicle Parking Design Standards) since it confers competitive advantage on such locations and would be contrary to the sustainable transport objectives of the Plan. As such, it will require a commensurately higher level of public benefits in the overall planning balance to outweigh the policy conflict.	demonstrate good connectivity by sustainable travel and that impacts on the road network are mitigated. In response to this comment, additional wording about minimising parking has been added.

C1	Threshold for retail impact assessment	The requirement for retail impact assessment for proposals for out-of-centre developments exceeding 350m² should be justified in the Plan given the default threshold of 2,500m² in the NPPF. It is assumed to reflect to the oversupply of retail and leisure floorspace in the city, as evidenced through widespread repurposing of such floorspace for other purposes in the city centre, and endorsed by the evidence base¹. This needs to be clearly stated in the Plan. This requirement for a costly assessment is not justified and the approach does not support 15-minute city goals.	Given the overall aims of the plan is to ensure sustainable modes of travel, any proposals in less accessible locations could be particularly damaging to these aims, and the requirement for retail impact assessments from small out of town units is considered justified.

Draft policy	Topic	Summary of comments	Response
C1	Flexibility within Use Class E	Caution against limiting the flexibility to change between uses within Class E, if that is what is foreshadowed in paragraph 7.3, bullet 5, which would be contrary to the Government's intentions through the Use Classes Order and permitted development regime, and prejudicial to the commercial imperative to be able to respond to rapid changes in the retail and leisure industries as foreshadowed in NPPF, para. 90(a).	There is no intention or means to prevent change within Use Class E.

C1	Supportive	Cyclox are pleased to note that you are aspiring for residents to be within 20 minutes' walk or a short cycle ride of most services. This will encourage people to walk or cycle and is consistent with your overall aims.	Support is welcomed.
C1	Additional local centres	The policy should define additional Local Centres such that all homes (or say 95%) are within a 15-minute walk of a Local Centre. Some potential additional local centres were mentioned: Littlemore; Greater Leys; Botley Road; Abingdon Road/New Hinksey, Lower Wolvercote, Cutteslowe, Kassam area when development happens.	The NPPF is very clear that defined local centres and 'town centres' suitable for town centre uses, and that they must be more than a small parade of shops of significance only to the immediate neighbourhood. These smaller centres in many cases
Draft policy	Topic	Summary of comments	Response
C1	Headington district centre boundary	Headington District Centre includes Bury Knowle Park. This is not effective and not justified. It is therefore unsound as most of the uses are clearly inappropriate for a Core Green Space such as Bury Knowle Park.	Bury Knowle Park has strong protection as part of the Core Green Infrastructure Network. It is in the district centre as a key part of the offer of the centre that is part of its attraction to the community (including the library), but it does not mean that town centre uses would be permitted on the park.

Draft Policy	Summary of comment	Response	Outcome

Draft Policy C1 – City, District and Local centres	Transport Strategy At paragraph 7.1 – It would be beneficial to acknowledge here that there are areas of Oxford which suffer from severance from the city centre due to the road ring road and the barrier this creates around the city.	Noted. We can consider whether adding a reference to severance is appropriate in this section of the plan.	Oxford City Action: consider inclusion of text

Statutory Consultee Comments – Draft Policy C1

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome

2532

	Adding reference to Oxfordshire becoming a Marmot Place would be welcome to showcase how this can help tackle health inequalities and support Oxford in becoming A Liveable City with Strong Communities. Suggest adding wording which plays emphasis on the benefits Mobility Hubs will bring. For example, support LTCP targets and provide transport choice for the residents of Oxford. The opening sentence is not clear on the definition of mobility hub. It reads that the city and district centres as a whole, are mobility hubs. This sentence should be reworded and provide clearer language. One example could be: “The city and district centres include a range of mobility hubs (refer to Mobility Hub Strategy) helping to create places which are highly accessible.” Public Health	We note that Oxfordshire County Council is initially focussing on three of the Marmot Principles and has developed a number of projects aligned to them. We can consider whether to add a reference to the plan on this issue. We do not consider this cross reference is necessary as mobility hubs already feature in the LTCP. A Definition of Mobility Hub is contained in the Glossary of the Local Plan. We will ensure that any text about Mobility Hubs provides clarity as to what they are.	Oxford City Action: consider inclusion of text No Action Required Oxford City Action: consider inclusion of text

Draft Policy	Summary of comment	Response	Outcome

	This appears to be the only policy which contains any reference to hot food takeaways (HFTs). While we support the notion that proposals for new HFTs will not be permitted outside of the city, district or local centres, this doesn't go far enough to adequately restrict unhealthy food environments. There should be a standalone policy focusing on the restriction of HFTs and, similar to many other local authorities in the UK, this should specify a minimum 400m/ walk buffer zone from schools. From March 2025 the new National Planning Policy Framework contains an explicit direction to 'prioritise preventing ill-health' stating that local planning authorities should refuse applications for hot food takeaways and fast-food outlets that are near where children congregate (unless in a designated town centre).' In Oxford, children living with excess weight is concentrated in some areas, particularly more deprived areas (in some cases with levels of excess weight being over 40%) and close to local centres where there are already hot food takeaways (proliferation –	We are not considering the inclusion of a stand-alone policy on HFTs. Our policy approach broadly aligns with the national policy approach as it does not allow HFTs outside designated centres. The NPPF definition of town centres states that: <i>References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance.</i> The inclusion of a 400m buffer zone policy in Oxford would effectively increase opportunities for HFTs in additional locations across the city that are outside the city, district and local centres.	City and County Council officers met to discuss the County Council comments on Hot Food Takeaways. Following on from that meeting, no changes have been proposed. However, the County Council still consider a location policy approach to Hot Food Takeaways as described in their response should be included in the plan.

Draft Policy	Summary of comment	Response	Outcome

	increasing numbers of hot food takeaways is linked to higher levels of excess weight). To both tackle excess weight and health inequalities, the wording of the Oxford Local Plan should be strengthened by including a standard restriction on any new hot food takeaways within 400m radius of any school AND by not allowing new hot food takeaways in geographical areas with consistently higher levels of excess weight in children – above the Oxfordshire and England averages. Given the geography of Oxford City the wording could be “no new hot food takeaways will be granted within 400m radius of any school or in any geographical areas with higher levels of excess weight in children than the England or Oxfordshire average (with the exception of within Oxford City Centre).” Similar wording has been incorporated into Local Plans elsewhere. There is backing data to support this approach readily available from the public health team – including accurate excess weight data for children and number and type of hot food takeaway (including proliferation in areas of excess weight).		

	A Healthy Weight Health Needs Assessment undertaken in 2023 found frustration amongst Oxford		

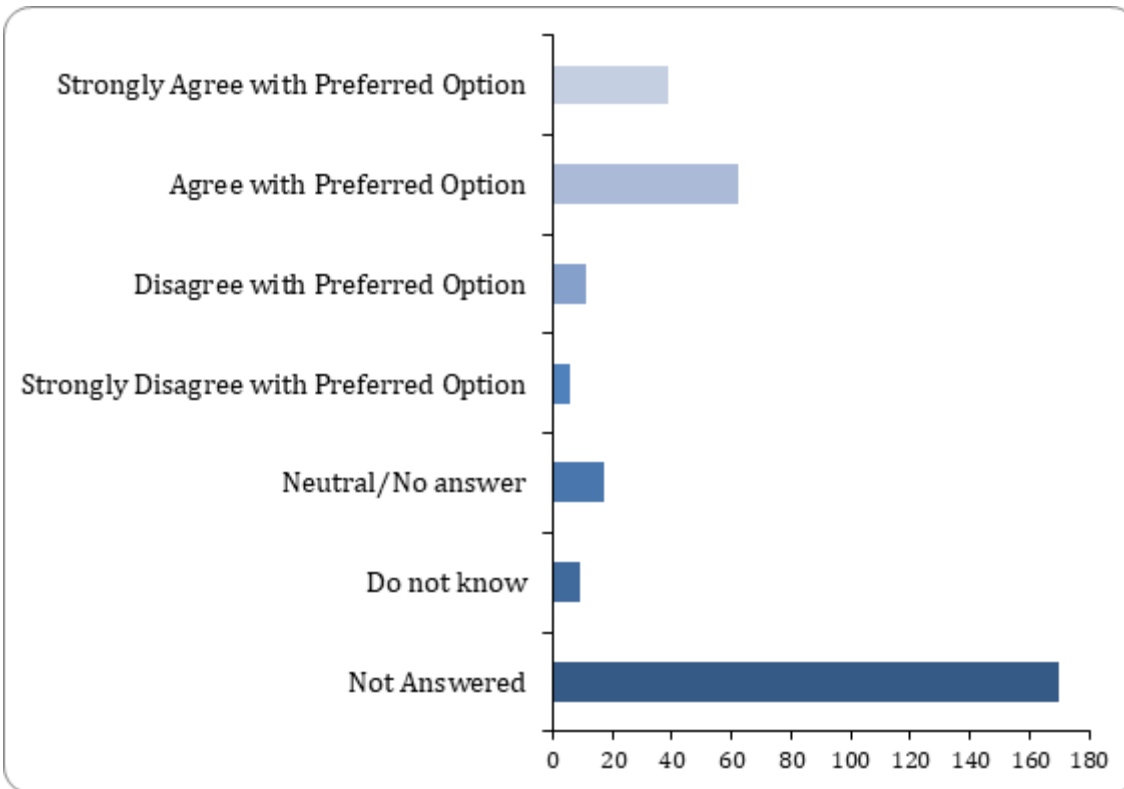
Draft Policy	Summary of comment	Response	Outcome
	City population of the easy access to ‘fast food’ close to home leading to increased likelihood of consuming this which has higher calorific as well as fat, sugar and salt content. The suggested change links to local policy. Oxfordshire Joint Health and Wellbeing Strategy 2024-2030 as part of immediate actions for healthy people and healthy places on page 20 (published Jan 2024): Take opportunities to shift the environment toward being healthier – advertising healthy options rather than food or drink high in fat, salt or sugar, and restricting the introduction of new hot food takeaways. A letter from Oxfordshire’s Health Overview and Scrutiny Committee to the Head of Planning and Chief Executive urged Oxford City to take this approach. The Local Plan cannot effectively deliver its vision for Oxford to be a healthy, inclusive and fair city without such a policy. The County Public Health team can support City Council officers, share detailed data on the subject and support a draft modification of the Local Plan.	We disagree that the inclusion of such a policy would mean that the Local Plan does not effectively deliver its vision. Especially as the proposed approach in the plan to restrict HFTs	

Draft Policy	Summary of comment	Response	Outcome
		to the city, district and local centres only is aligned with national policy.	

All Public Responses – Draft Policy C2

Please tell us what you think of policy options set 013b (draft policy C2): Maintaining vibrant centres.

There were 144 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	39	12.42%
Agree with Preferred Option	62	19.75%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	17	5.41%
Do not know	9	2.87%
Not Answered	170	54.14%

Draft policy	Topic	Summary of comments	Response
C2	Change away from retail/Class E is needed	Too many empty shops/the ongoing repurposing of Class E floorspace is evidence of oversupply and shows it's clearly time to allow a change away from retail. Centres should reflect the wide variety of uses that serve different communities. Non Class E uses make an important contribution to overall vitality and viability and maintaining investment that protects against physical decline.	Use Class E is a very broad Use Class, allowing a very wide range of facilities within the thresholds (as well as the thresholds allowing many other uses a well).

C2	Setting Use Class E threshold inappropriate	The NPPF does not set prescriptive targets for active frontages in District Centres, although it does encourage the vitality and vibrancy of centres overall. Setting a threshold in this manner will ultimately restrict the opportunities available to modernise and respond to the change in retail and shopping habits since the Covid-19 pandemic. Retention of existing thresholds (para. 7.4, bullet 7) that are a snapshot of current trading profile, operator representation and market circumstances may not facilitate the essential and rapid response to dynamic retail and leisure markets and could impact negatively on the longer-term vitality and sustainability of centres. With resi above there will be considerable pressure on ground floor space which will also need to incorporate residential	All the thresholds are set comfortably above current levels. In addition, the policy does allow significant flexibility, in allowing for justification of falling below the Use Class E threshold, as well as by Use Class E relating to a very wide range of uses.

Draft policy	Topic	Summary of comments	Response

		entrances, escapes for upper floor uses, bins and bike store, all of which have a space requirement at ground floor. Where comprehensive redevelopment of a site in a District Centre is proposed then compliance with any threshold is not required, but instead demonstrated 'maximisation' of active nonresidential frontage is required. Further consideration is also required on what is currently deemed as an 'active frontage' within the Templars Square site ie. Internal vs external to the shopping centre. The current policies map suggests that internal areas are 'shopping frontage'. We do not consider this is correct. An active frontage is an outward facing unit/frontage, CBRE and ORVIL can assist with the process of defining the existing active and street facing frontages on the Templars Square site.	
C2	Supportive	Some comments in support of various aspects of the policy including that there's a suitable level of flexibility.	The support is welcomed.
C2	Unclear policy/clarity suggestions	Comment policy is not effective as it is unclear and comment that the first sentence requires amendment or the addition of further text or bullet points to reference the city and district centres.	Agreed- this has been amended.

Statutory Consultee Comments – Draft Policy C2

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome
Policy C2 Maintaining Vibrant Centres	Transport Strategy This policy should state Oxford City Council will incorporate the County's future Street Design Code which includes a Kerbside Strategy (anticipated later this year or early next year).	We can only include references to adopted/ published strategies.	Oxford City Action: Watching brief for County studies publication
	Suggested wording: The densification and growth of district centres and the city centre is encouraged. High density development is generally expected in the city centre and district centres as set out in Policy HD8, and this should be low car and have incorporated OCC's Street Design Code"	We do not see the need to cross reference other policies in the plan in this instance. The plan should be read as a whole. As the County's Street Design Code is not yet published, we cannot make reference to it.	No Action Required
	Including stronger language would benefit the following: e) rationalisation of public car parking so it is well-located limits and reduces surface-level parking where possible, and makes better use of workplace surface level car parking; f) public realm improvements for cycling -sts and pedestrians and public transport users and	This change weakens the policy as is does not support "well-located" public car parking.	No Action Required

2546

	rebalancing of the space within streets from vehicles	The amendments proposed seem to prioritise public realm	No Action Required (see response for Policy C7 below re: children's bikes)
	to pedestrians; by providing cycle parking in convenient locations which benefit the public realm	improvements for cycling and focus on cycle parking (Policy C7 already covers cycle parking requirements). As such, the proposed changes to are not accepted.	

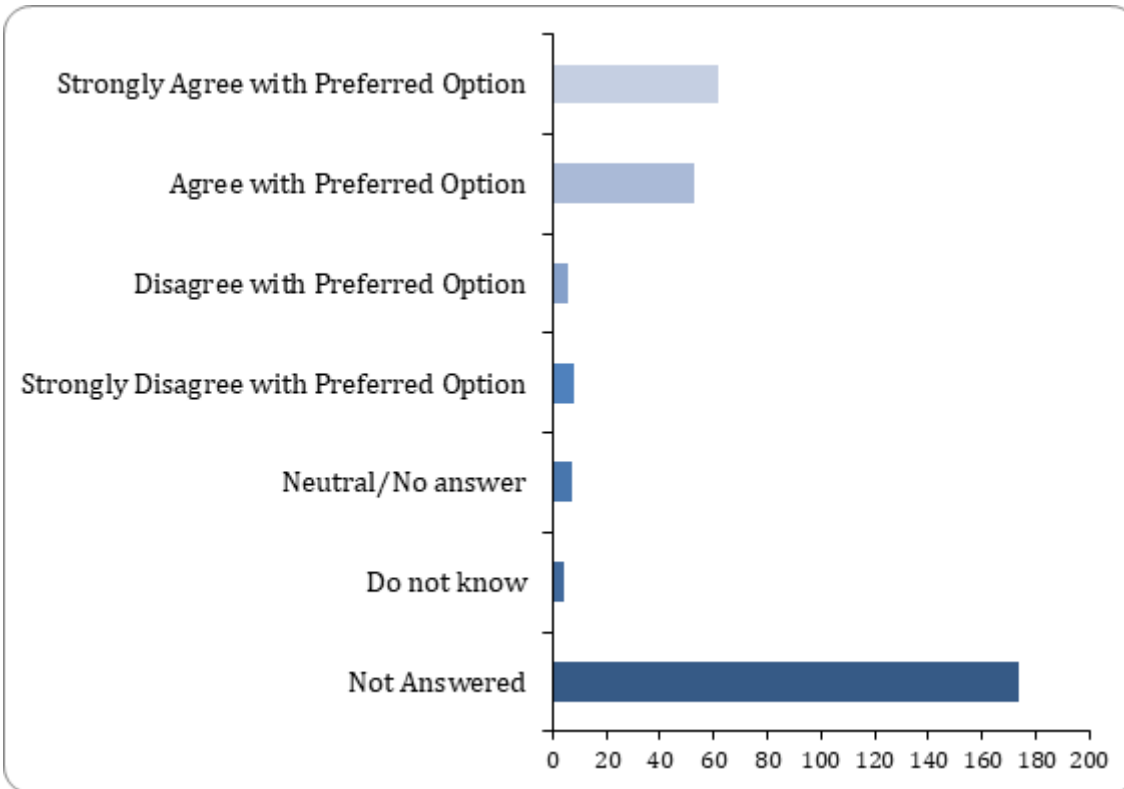
Draft Policy	Summary of comment	Response	Outcome
	using thoughtful inclusive design and materials, catering for standard and non-standard bikes, including children's bikes g) Public realm improvements for pedestrians and public transport users and rebalancing of the space within streets from vehicles to pedestrians. Within active frontages page 154, it would be helpful to include a sentence referring to maintaining active frontages through inclusive design to ensure accessibility and a positive experience for people. Urban Design (Placemaking) Paragraph 7.4 – some reference should be made in relation to densification around city/district centres, it is important to still ensure there is some	Policies covering the design of development proposals are covered elsewhere in the plan (e.g., Policy HD7 – High Quality Design). Bullet point h) of the policy makes reference to new opportunities for public realm and the incorporation of small green spaces where people can dwell, socialize and play.	No Action Required No Action Required

	open/public space for people to dwell, rather than expect everyone to pass through.		

All Public Responses – Draft Policy C3

Please tell us what you think about policy options set 013c (draft policy C3): Protection and Alteration of Existing Local Community Facilities.

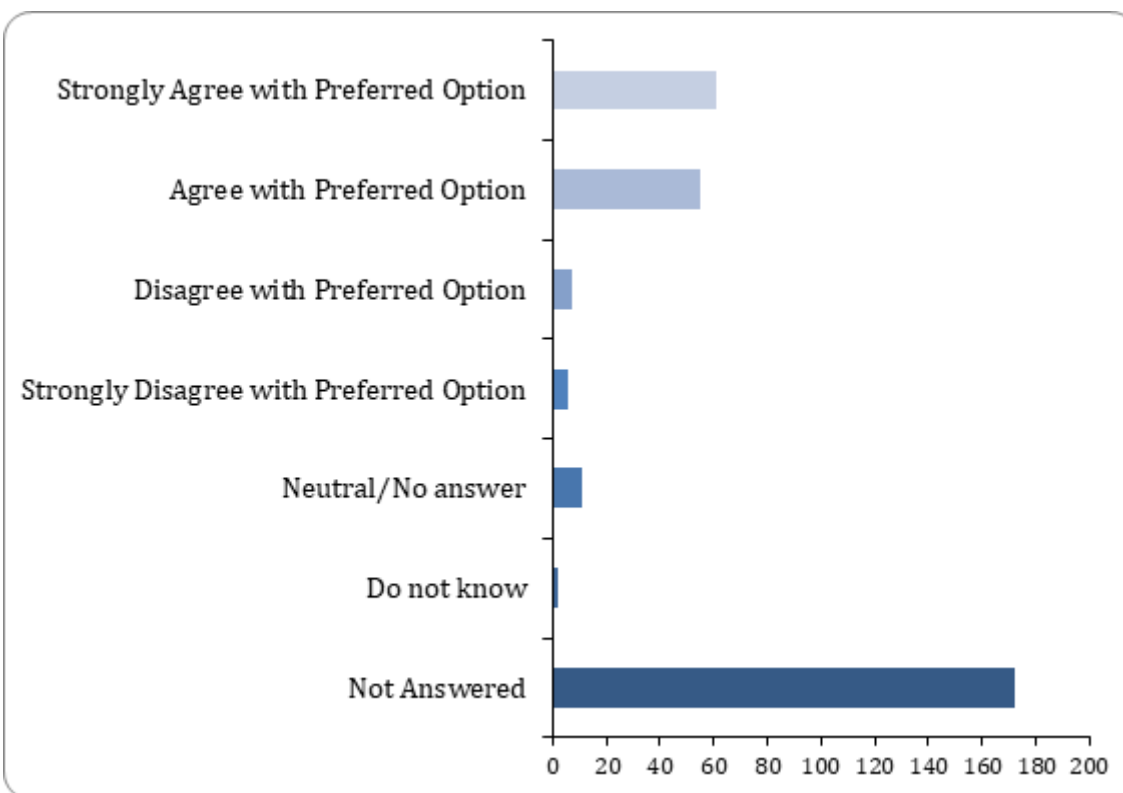
There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	62	19.75%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	6	1.91%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	7	2.23%
Do not know	4	1.27%
Not Answered	174	55.41%

Please tell us what you think about policy options set 013d (draft policy C3): Provision of New Local Community Facilities

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	61	19.43%
Agree with Preferred Option	55	17.52%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	11	3.50%
Do not know	2	0.64%
Not Answered	172	54.78%

Draft policy	Topic	Summary of comments	Response
C3	Exception to the policy should be applied to major sites	The policy relating to small-scale shops should be clarified to be clear that it is relating to individual isolated small shops that serve localised and more isolated communities.	The policy does say it applies to shops meeting the definition of Use Class F2- but brackets have been added to spell out what this is in terms of size and having no other facility within 1,000m.
C3	Greater protection needed.	Only like for like replacement should be allowed, following extensive community engagement. Loss of parts to fund other things is not sustainable.	It is considered important that the policy does allow flexibility for more modern or efficient combined facilities that respond to current needs.
C3	Do not protect community assets or be cautious about over protection	A few comments saying there should be no protection of community assets, including because there should be no meddling in assets not owned by the City Council (and whether the City Council should own assets it does should be reviewed). Also because protecting chronically underused facilities or those duplicated nearby or that could be more efficiently provided in a mixed-use development would be more useful. If replacements/contributions are proportional or there are other facilities in walking distance then they should be lost.	Regardless of ownership, community facilities can be really important for many social and quality of life reasons. There is no evidence at all that Oxford has chronically under-used facilities, and the policy does have flexibility to make a case for variations in provision.

		Too much expectation may mean developments don't happen at all.	

Draft policy	Topic	Summary of comments	Response
C3	Supportive/ support with minor comments	Some support of protections. Comment that some spaces are not safe for all, e.g. some churches may not feel welcoming to LGBTQIA+ or other faiths, so not a community facility for all.	Comment noted.
C3	Use of colleges	Make the universities share facilities. Require private developer and college contribution to existing assets.	The policy does say that opportunities will be taken to secure community use and joint user agreements.

C3	Access	Not clear why these new facilities must be easily accessible by sustainable transport, but commercial developments and new housing not subject to the same tests.	New developments are generally subject to these requirements, but also it is the case that community facilities by definition attract people, so they must be able to travel there sustainably.
C3 & C6	Community-led regeneration	Would like to see policy to discourage vacant properties and support community-led regeneration e.g. introduce “meanwhile uses” and council using CPO and High Street Retail Auctions to bring properties back into use. See Cambridge example.	Policies are considered flexible enough to respond to any proposals, but promotion of these measures is outside the planning system.
C3 & C6	More protection for cultural, social and leisure activities	Draft Policies C3 and C5 do not adequately protect cultural, social and leisure activities and culture because they do not take into account that the people and communities are starved of access to facilities when community centres and venues are closed down for long	Significant redevelopment of facilities may take some time, and too many requirements about temporary re-provision may act to stifle opportunities for redevelopment.
Draft policy	Topic	Summary of comments	Response

		periods, years in some recent cases for redevelopment to take place. They appear to have the intention of preserving community and culture by specifying that a space has to be retained or a suitable local equivalent has to be provided by the applicant. The wording is much like the existing policies in the 2036 Plan under which the above examples occurred. However, a newly built or appointed facility opened years after closure of the original means that the culture and community will either have moved on or just died.	

Statutory Consultee Comments – Draft Policy C3

Oxfordshire County Council

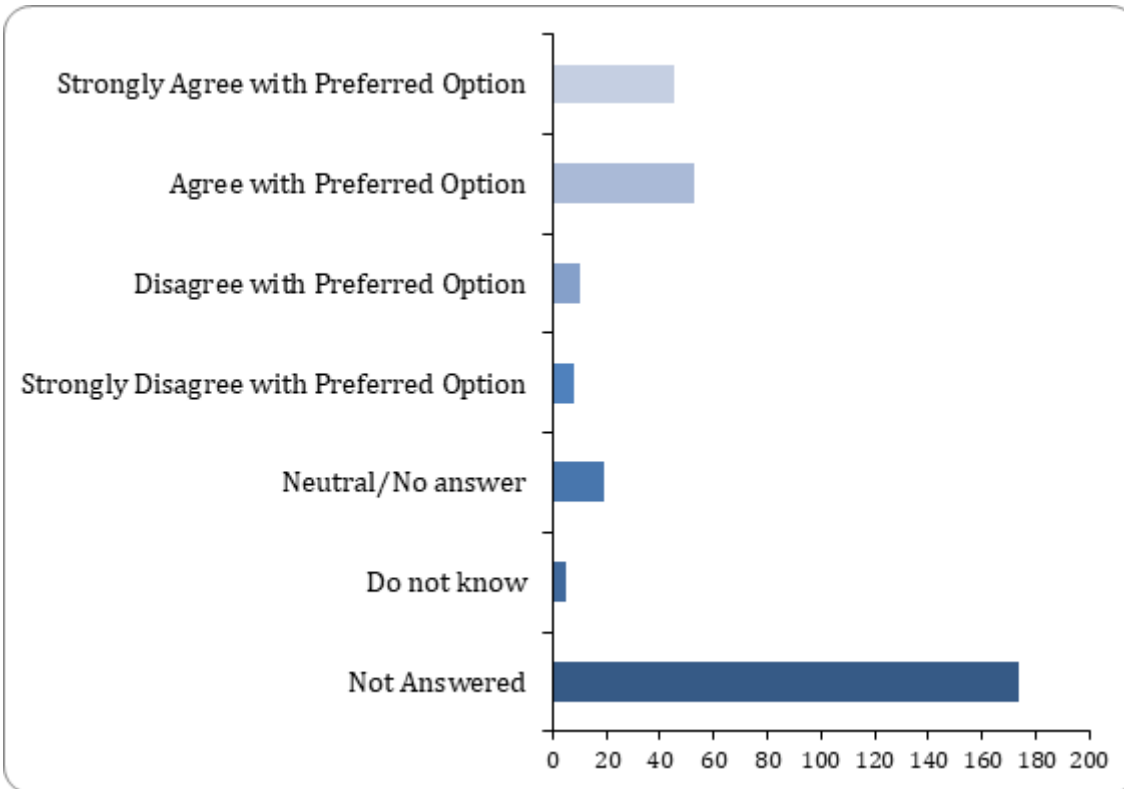
Draft Policy	Summary of comment	Response	Outcome
Policy C3 Local Community Facilities	County Council Property and Estates Team Oxfordshire County Council Property and Estates Team overall support this draft policy; however, it is considered that the type of evidence that would need to be submitted with a planning application for a development that would result in the loss of a community facility should be specified either in the supporting or policy text to improve clarity.	Policy C3 clearly sets out that the loss of community facilities will not be supported unless one of the three bullet point criteria are met.	No Action Required

Draft Policy	Summary of comment	Response	Outcome
	It would be helpful to clarify the type of evidence that would be required to justify such development proposals, as OCC owns several community facilities and a need may arise in the future for their alteration which will be for the public benefit of the local community.	Evidence would need to be provided that one of the three bullet point criteria has been met.	No Action Required

All Public Responses – Draft Policy C4

Please tell us what you think about policy option set 013e (draft policy C4): Protection and Alteration of Learning and Non-residential Institutions.

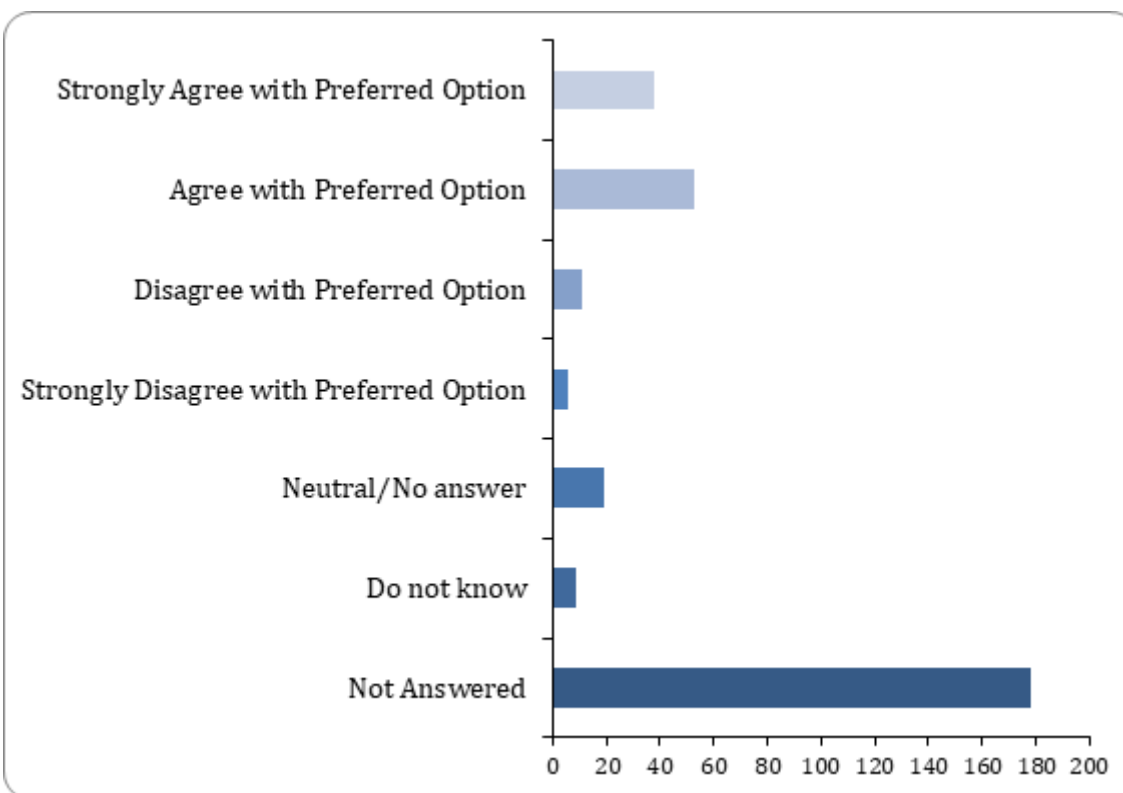
There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	10	3.18%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	19	6.05%
Do not know	5	1.59%
Not Answered	174	55.41%

Please tell us what you think about policy option set 013f (draft policy C4): Protection and Alteration of Learning and Non-residential Institutions.

There were 136 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	38	12.10%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	19	6.05%
Do not know	9	2.87%
Not Answered	178	56.69%

Draft policy	Topic	Summary of comments	Response
C4	Support	Support in principle	The support is welcomed.
C4	Should allow loss/should not have a policy protection.	Allow loss for homes Do not protect at all- market forces and national policy cover. Policy over-reaching Ossifies valuable plots even when it could be better used.	The use class F1 includes schools, museums and libraries, which are important pieces of infrastructure to support communities, needed in the city, which should have some protection. However, the policy is flexible enough, to allow responses to a change in need.
C4	Should be more restrictive of these use	No more private schools. No more expansion of education sector. Issues such as traffic stress. No capacity for more education institutions. Transport impacts need to be better managed.	The planning system is unable to treat private schools any differently to state schools. Accessibility by sustainable travel is key part of the assessment criteria in the policy.

C4	Policy should not exclude universities	Policy confirms “This does not apply to academic institutions exclusively for 18+ students such as the University of Oxford and Oxford Brookes University.” This statement is objected to, with the basis of this being that there is no alternative policy that is considered to be comparable and allowing objective assessment of the need for new facilities. If the policy is to be brought	The universities meet different needs and have different considerations, and the policy is not intended to apply to them. The main impact of the universities is student accommodation, which is
Draft policy	Topic	Summary of comments	Response
		forward, the caveat should be removed, or an alternative University development specific policy should be proposed.	managed by policies in the housing chapter.
C4	Open to manipulation	Institutions may use the policy to get a footprint in the city that can then be repurposed for financial gain.	This potential occurrence can’t dictate whether or how new learning facilities should be allowed.

C4	Objection	OCC has, at every single local plan, attempted to block any rivals to Oxford University or other institutions trading on the Oxford moniker. Modification Requested: Remove the phrase "<i>the proposal will meet local needs or an existing deficiency in provision or access</i>" - this is a "backdoor method" of banning new institutions Many of the of requirements of this policy are addressed in other policies such as traffic and environmental impacts.	There is a third university with a presence in Oxford- the University of West London has a campus at Ruskin College, Dunstan Road. It is important new facilities meet local needs.

Statutory Consultee Comments – Draft

Policy C4

Oxfordshire County Council

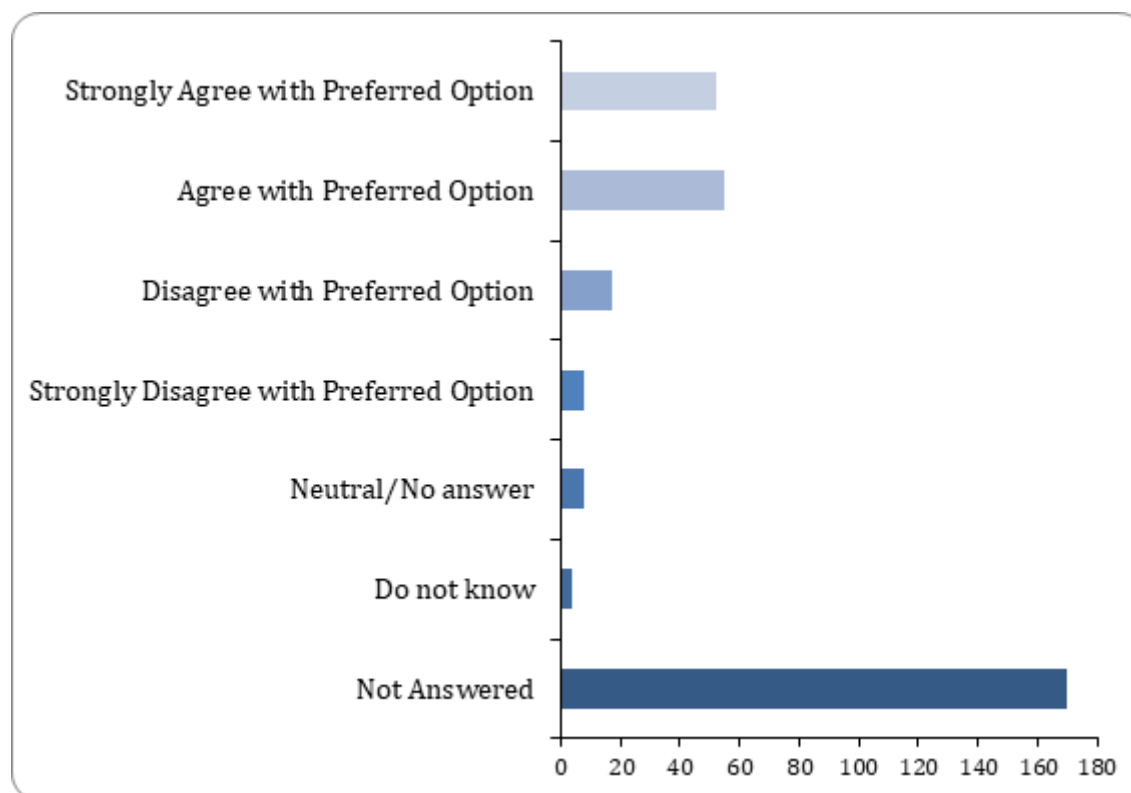
Draft Policy	Summary of comments	Response	Outcome

Policy C4 Learning and non-residential institutions	County Council Property and Estates Team Oxfordshire County Council Property and Estates Team supports this draft policy and would appreciate if some supporting text were to be added that would explain the level of information needed to comply with this draft policy when considering the cases where joint user and shared user agreements are not possible. Education Team Paragraph 7.9 makes reference to 'Local Education Authority' which is no longer the used definition. Please update to refer to 'Local Authority with responsibility for Education' within the plan (see also Page 188).	The policy does not set out requirements for the granting of planning permission based on securing community/ joint use agreements. Where opportunities exist, they should be taken. Noted. We will make sure the correct reference is used.	No Action Required Oxford City Action: Ensure correct terminology is used.

All Public Responses – Draft Policy C5

Please tell us what you think about policy option set 013g (draft policy C5): Protecting Cultural, Social and Visitor Attractions.

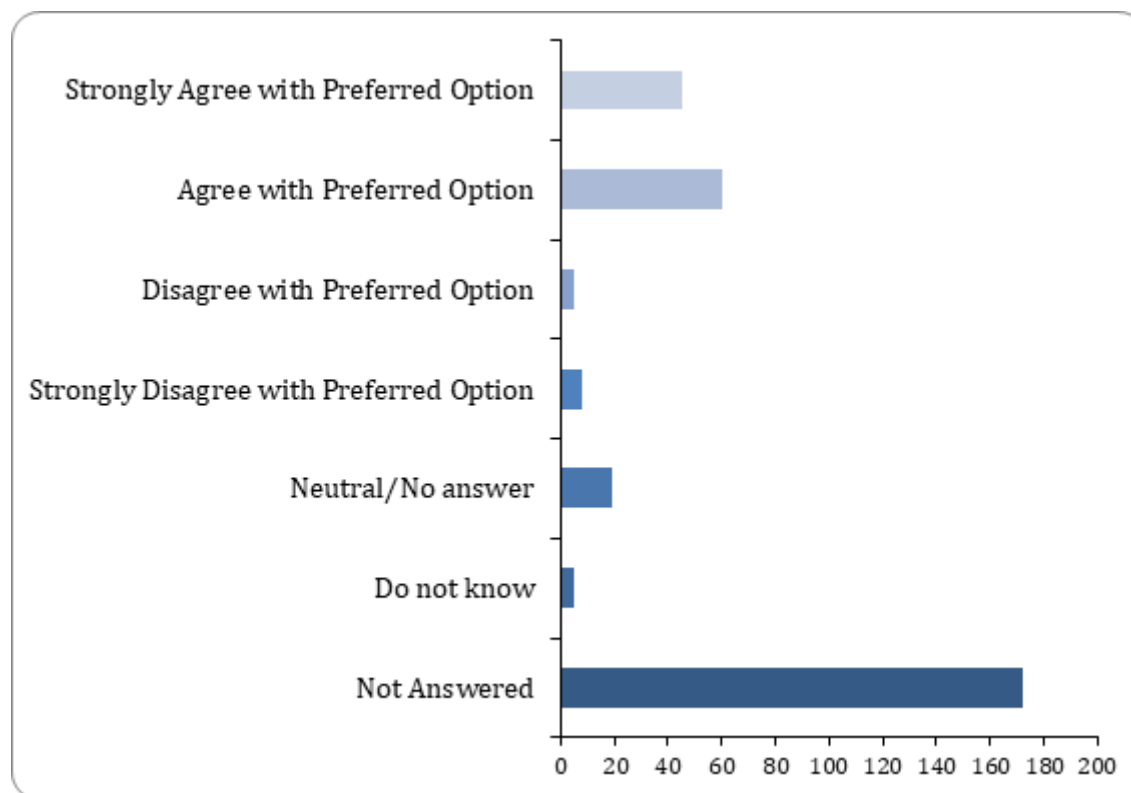
There were 144 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	52	16.56%
Agree with Preferred Option	55	17.52%
Disagree with Preferred Option	17	5.41%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	8	2.55%
Do not know	4	1.27%
Not Answered	170	54.14%

Please tell us what you think about policy option set 013h (draft policy C5): Provision of New Cultural, Social and Visitor Attractions.

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	60	19.11%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	19	6.05%
Do not know	5	1.59%
Not Answered	172	54.78%

Draft policy	Topic	Summary of comments	Response
C5	Support	General support- good to preserve facilities and allow new.	The support is welcomed.
C5	Alternative options	Preference for alternative option 1/alternative option 2- more flexible/pragmatic, leave to the market, preferred option prevents dynamic change. Leisure tastes change and business models shift. Should not freeze every cinema, museum, etc.	The policy is implicitly clear that facilities do not have to be protected in exactly the same use within the general category, but addition has been made to the policy to make this clear. So a cinema does not necessarily need to remain as a cinema if alternative kinds of facilities would meet needs. This does give sufficient flexibility.
C5	Heritage	Historic use may be important to character.	Policy HD2, relating to listed buildings, is clear that the use of the listed building may be part of its significance.
C5	Pubs	Suggest use of CAMRA's Public House Viability Test, to ensure pubs are not deliberately run down so they can be redeveloped into more profitable uses.	Marketing evidence is required, with details set out in Appendix 7.1.
C5	Implementation	Implementation is key. Policies are too woolly. Need to make sure meet range of needs, including young people. Should	The vast majority of greenfield spaces in the city are protected

		ensure these facilities are not on greenfield sites. Should not limit things	by other policies. The conversion of a

31

Draft policy	Topic	Summary of comments	Response
		happening like a famous person's house becoming a museum after they die (or similar)	house (for example) to a museum is not ruled out by the policy, but justification and mitigation of impacts would be required, which is considered to be the right approach.

C5	Flexibility should apply. Supporting text suggestion	It should be made evident in the policy that flexibility should apply with regard to the application of this policy against wider plan policies to enable development to be delivered to meet the ambitions of the Local Plan and in particular with reference to the Nuffield Sites. It is suggested that supporting text is incorporated which supports a flexible approach toward protection and retention of cultural venues where site allocations are supported for comprehensive mixed use redevelopment, as well as an additional bullet point included in the policy itself regarding the list of circumstances where the loss of cultural venues is supported. this additional bullet point could be incorporated/read as follows: • Or forms part of comprehensive, mixed use development scheme.	There is not a need to make an exception to the policy for allocated development sites, as the policy itself allows sufficient flexibility.

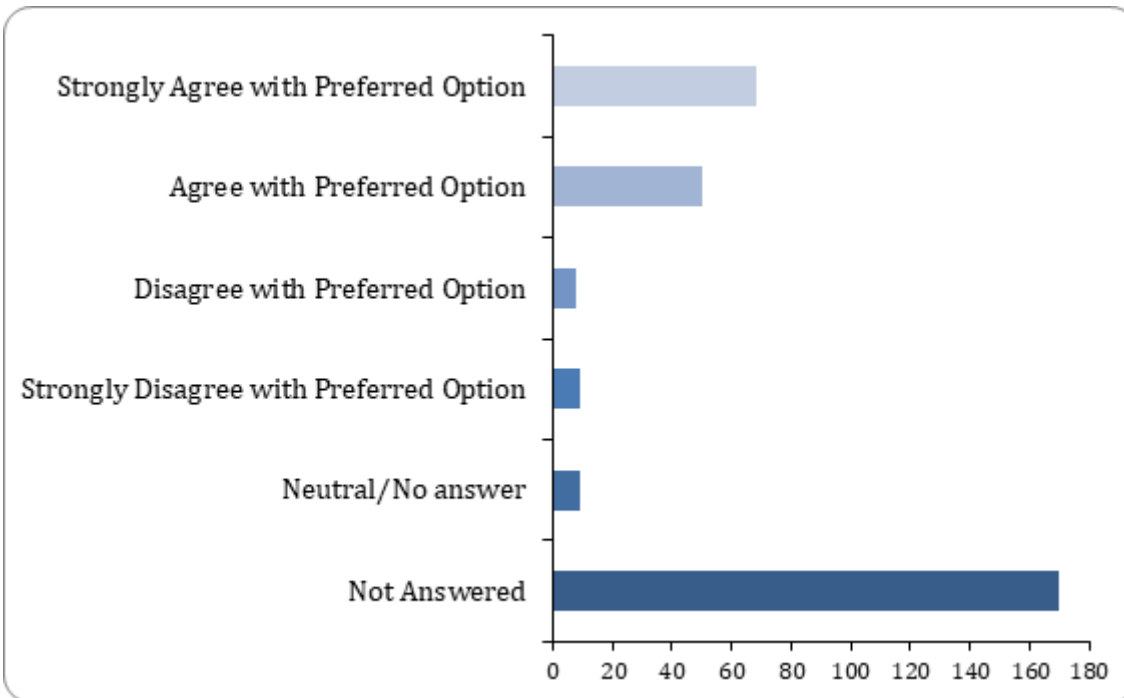
Statutory Consultee Comments – Draft Policy C5

There were no statutory consultee comments.

All Public Responses – Draft Policy C6

Please tell us what you think about policy option set 012a (draft policy C6): Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans

There were 144 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	68	21.66%
Agree with Preferred Option	50	15.92%
Disagree with Preferred Option	8	2.55%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	9	2.87%
Do not know	0	0.00%
Not Answered	170	54.14%

Draft policy	Topic	Summary of comments	Response
C6	EV parking should be prioritised over cycle parking	The idea of assessing travel and transport is good but current plans of restricting cars and parking bays is bad. Oxford should be planning for the future by providing an infrastructure for electric cars and independent transport with parking areas built under all new buildings with charging stations rather than letting developers off by simply providing an inexpensive bike rack.	The Oxfordshire Electric Vehicle Infrastructure Strategy sets out the policies and plans to realise the County, City and District Councils vision for EV charging in Oxfordshire. The design and location of any EV charging infrastructure should consider and avoid negatively impacting on street scene in line with the principles of high quality design and the supporting design checklist.
C6	No transport/travel policies	Do not include a policy requiring transport assessments/statements, travel plans, construction management plans or service and delivery plans.	Noted.

C6	Traffic – private school drop offs	Require all private schools within the city to have a transport plan for students that includes assessment of their impact and their steps taken to provide mass transport e.g. buses and prevent single occupancy cars from dropping off. The traffic vanishes from Oxford during private school holidays - address	The City Council will continue to work with the County Council to identify potential solutions to conflicts between different road users in the city centre, with the aim of enhancing public realm, whilst also allowing good

Draft policy	Topic	Summary of comments	Response
		this and we will have much better traffic flows in oxford termtime too.	accessibility by bus. However, the details of this work, and implementation of schemes, will be led by the County Council as Highways Authority and are outside the realm of the Local Plan.
C6	Better public transport	Public transport needs to be frequent, affordable and accessible. Subsidies may be needed to fully achieve this Council needs to work closely with the county and bus companies to achieve this.	Noted. A key aim of the City Council and of the County Council as Highways Authority is to promote a shift to sustainable modes of travel.

C6	A40 congestion – impact of Oxford North	I look forward to what you are going to do about the impact of the Oxford North Development on traffic congestion on A40 area.	The link road is already under construction, as part of the Oxford North planning permission.
C6	Policy to only include locally specific transport mitigation requirements	BMW support alternative option 1. Planning policy should be distinct from the validation requirements. The local validation checklist should set out when a Transport Assessment, Travel Plan and/or Servicing and Delivery Plan is needed, and policy should only include the locally specific transport mitigation requirements that are not previously covered in national policy.	Appendix 7.2 outlines when an assessment is likely to be required, as well as potential mitigation measures.

Draft policy	Topic	Summary of comments	Response

C6	Construction Management Plans should be required for all developments	Developers of large sites should be required to liaise with other developers within a 1km range of their site and work together to ensure CMPs have minimum impact on local residents. Construction Management Plans should be required not just where large amounts of construction traffic will be generated, but also for developments where smaller amount of construction traffic may cause significant disruption to the surrounding area (e.g. on small residential roads where access to the site may be very limited).	The policy (as drafted) requires Construction Management Plans (CMP) to be submitted where the proposed development will generate significant amounts of movement. The requirement for a CMP can also be conditioned as part of any planning permission if appropriate and necessary.
C6	Supportive	Cyclox support the proposed policy on Transport Assessments, Travel Plans, and Service and Delivery Plans, and align with the Coalition for Healthy Streets and Active Travel (CoHSAT)'s response. We highlight the poor condition of Oxford's pavements, which are often uneven, obstructed, and difficult to navigate for wheelchair users, people with buggies, and those with mobility issues. To address this, policies should require pavements to remain level across driveways - avoiding the current car-centric design - and mandate the use of Dutch Entry Kerbs, now adopted as Oxfordshire County Council policy. Developers and homeowners undertaking renovations should be required to implement these standards.	Appendix 1.1 of the draft Local Plan sets out a design checklist that development proposals are expected to consider.

Draft policy	Topic	Summary of comments	Response
C6	Support but policy could go further to reflect NPPF	It is considered that this policy is sound with regard to the promotion of sustainable/active modes of travel, and the documentation that is required to support an application. The Reg 19 reps submitted by CBRE in Jan 2024 expressed concern with parts a) and b) of this policy. However, it is noted that the Local Plan 2042 reg 18 document now refers to 'no unacceptable impact on highway safety', rather than 'no impact on highway safety'. This is welcomed. It is also welcomed that the wording of part (b) has been updated to refer to 'no severe residual cumulative impact on the road network'. This wording could still go further to reflect the wording in the updated NPPF 2024, para.116, which also refers to mitigation and all reasonable future scenarios. It states: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios". We request this is reviewed and incorporated in the next draft version of the Plan.	The current draft wording of additional policies covers these point. Draft policy C8 requires Transport Assessments to demonstrate that there will not be unacceptable impacts on the transport network. Draft policy C1 states "planning permission will only be granted where...impacts on the road network can be mitigated".

C6	Support with suggested amendments	We strongly support the proposed policy for Transport Assessments, Travel Plans and Service and Delivery Plans.	Minor amendment.

Draft policy	Topic	Summary of comments	Re
		o Travel Assessments and Travel Plans should recognise that 32% of households in Oxford do not have access to a car. 92% of adults are able to cycle and about 60% of adults in Oxford cycled in the last year. Over 90% of Oxford adults walked (or equivalent) at least ten minutes in the last year. (Sources: Census 2021, Cycling UK, Sport England Active Lives). o In addition to the Street Design Guide, Policy C6 should refer to any further OCC or best practice guidance, such as Active Travel England planning guidance (https://www.activetravelengland.gov.uk/planning-active-places) and the use of Dutch Entry Kerbs to keep pavements flat (https://www.oxfordshire.gov.uk/sites/default/files/file/roadshttps://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transportpolicies-and-plans/hsd-1100-115_p01_series_1100_-_dutch_entry_kerb.pdf and-transportpolicies-and-plans/hsd-1100-115_p01_series_1100_-_dutch_entry_kerb.pdf)	

		- o Appendices 7.2 and 7.3 need an addition for non-residential institutions to include for example libraries, museums and places of worship. - o We strongly support the inclusion of CLOCS	
C6	Objection	A typical bureaucratic view of the world, plan=delivered. Modification requested:	Po ab en an im ap ad an be to the in I
Draft policy	Topic	Summary of comments	Re

		Paragraph b) what does “...residual ... impact” mean? Paragraph c) the phrase “and within neighbouring areas” is ineffective. It is outside of the developer’s control. The policy is ineffective, as the policy does not actually result in any reductions. It implies that an increase in traffic is acceptable (which it is not as roads are already 100% full). The policy is also ineffective as it muddles planning with delivery of the plan objectives. The policy must state what must be done, rather than what should be planned for. The policy is Ineffective as it states, “is likely to”. This phrase is meaningless and only applies to the City Centre AQMA not the whole city.	The po wo do ma dir ref the The the de AQ 20 co ab Cit is n co to ap

Statutory Consultee Comments – Draft Policy C6

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome

2578

Policy C6 TAs, Travel Plans and Service Delivery Plans	Transport Strategy Paragraph 7.11, page 160 - It would be positive to add to 7.11 a reference to improving health outcomes along with the other outcomes mentioned here. Key things to consider when drafting this policy – recommendation for the bullets in this section below: We suggest this also includes reference to the County’s Freight Strategy, future OxRail 2040: Plan for Rail and future Street Design Code. It is also worth recognising the County are working on delivering an integrated transport policy which will be incorporated into LTCP, this will build upon the Oxfordshire Metro Concept. We recommend that C6 incorporates Vision Led Transport Planning as a requirement to ensure Oxford	Policy HD10: HIA already focuses on Health outcomes and requires a Health Impact Assessment. We can only include references to published/ adopted documents. Once these are published and available in their final “adopted” form, we can consider the inclusion of any costed infrastructure projects within our IDP.	No Action Required Oxford City Action: Watching brief for publication of county guidance/ strategies etc.

Draft Policy	Summary of comment	Response	Outcome

	City has the highest quality developments, showing how developers have used Vision Led Transport Planning to achieve sustainable transport infrastructure. It would be helpful in Draft Policy C6 if it also references how this policy will support LTCP policy to remove 1 in 4 car trips by 2030 and 1 in 3 by 2040 and reduce vehicle mileage. Travel Plans and TA's should actively show how they will be supporting this policy, this will also support the monitoring of Travel Plans. Within Draft Policy C6, outcome h) including e-bike/ecargo bike charging would support the growth of ebikes and e-cargo bikes. Travel Plans should incentive sustainable travel and support the delivery of cycle training for children, adults and families to support positive travel choices and provide health benefits to local communities.	We can consider the inclusion of the phrase Vision Led Transport Planning within the policy. The LTCP is the statutory transport plan for Oxfordshire. As such, no need to duplicate its content. Especially as this may be subject to change/ review when the next iteration is delivered. The plan already contains a policy on electric vehicle charging. Noted.	Consider including the phrase 'vision-led transport planning' No Action Required No Action Required No Action Required

Draft Policy	Summary of comment	Response	Outcome

	Place Planning and TDM teams (Central) We fully support the requirement for transport assessments to assess the multi-modal impacts of development proposals. The County Council's LTCP includes a transport user hierarchy to ensure future schemes consider walking, cycling, public and shared transport before the private car. It is important that development proposals also consider development impacts and any mitigation in this order too. We note this "The requirements for the transport assessment and travel plans are set out in Oxfordshire County Council's document Implementing Decide and Provide in Transport Assessments." Whilst this is helpful, it doesn't include this text in the policy wording itself. We think it would be incredibly helpful if specific reference to the County's Implementing Decide and Provide was included and worded as follows: <i>"All major development proposals must demonstrate that the methodology in Oxfordshire County Council's Implementing Decide and Provide: Requirements for</i>	Noted. We do not consider that the inclusion of adopted county council policy within our Local Plan is necessary.	No Action Required No Action Required

	<i>Transport Assessments document has been used to</i>		

Draft Policy	Summary of comment	Response	Outcome
	<i>assess the need for infrastructure and provision of transport services.”</i> The latest version of the NPPF published in December 2024, includes the new requirement for development proposals to follow a vision-led approach to transport planning. This is referenced in paragraphs 109 and 115 and in paragraph 118 (p.33), which states: <i>“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”</i> Further to this, the glossary at Annex 2 (p.80) of the NPPF describes a vision-led approach as: <i>“...an approach to transport planning based on setting outcomes for a development based on achieving well designed, sustainable and popular places, and</i>	We can consider the inclusion of the phrase ‘vision-led transport statement/ assessment/ plan’ in our Reg. 19 plan.	Oxford City Action: consider inclusion of text relating to ‘vision-led transport planning’

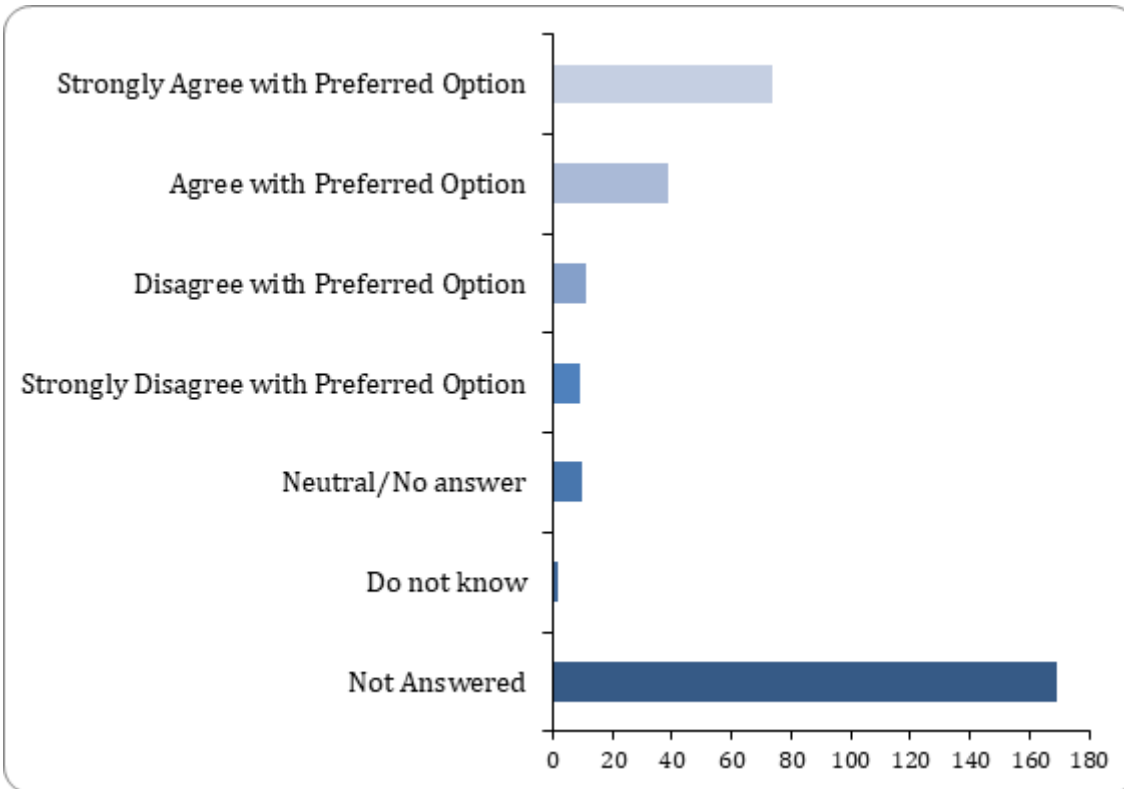
	<i>providing the transport solutions to deliver those outcomes as opposed to predicting future demand to</i>		
Draft Policy	Summary of comment	Response	Outcome

	<i>provide capacity (often referred to as ‘predict and provide’).</i>” When these changes to the NPPF were initially proposed it was stated in the supporting text for the accompanying consultation that (Chapter 8, paragraph 7, MHCLG), “To support the implementation of this updated policy, we will publish updated guidance alongside the policy coming into effect.” At the time of writing, this guidance remains forthcoming. Thus, in the context of this description of the vision-led approach and in lieu of the updated guidance, the Implementing Decide & Provide document should be seen as the methodology that development proposals within Oxfordshire must follow in order to meet the requirement set out in paragraph 118 of the NPPF. However, it is expected that, once the updated guidance is made available, the County’s Implementing Decide & Provide will be complementary to the national guidance and will remain necessary in setting out local requirements to ensure that a vision-led approach to transport planning has been followed.	Noted.	No Action Required

All Public Responses – Draft Policy C7

Please tell us what you think about policy option set 012b (draft policy C7): Bicycle Parking Design Standards.

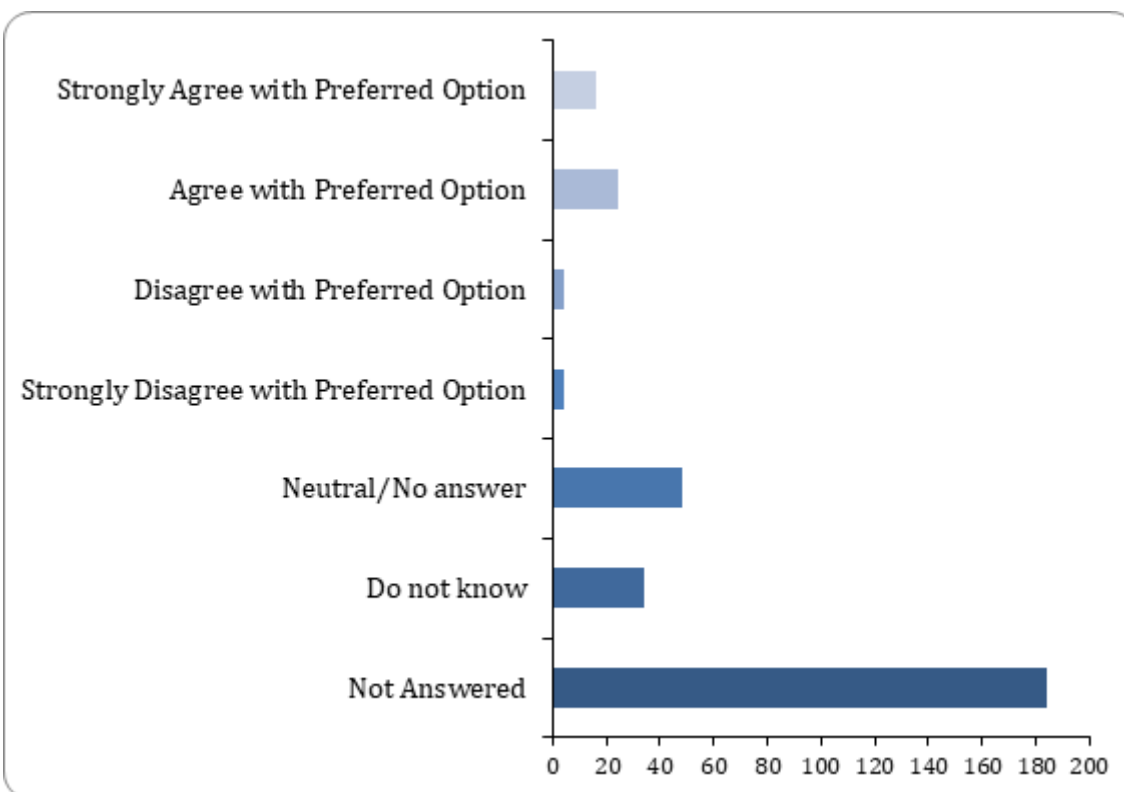
There were 145 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	74	23.57%
Agree with Preferred Option	39	12.42%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	10	3.18%
Do not know	2	0.64%
Not Answered	169	53.82%

Please tell us what you think about policy option set 012c (draft policy C7): Motorcycle and Powered Two Wheelers Parking Design Standards.

There were 130 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	16	5.10%
Agree with Preferred Option	24	7.64%
Disagree with Preferred Option	4	1.27%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	48	15.29%
Do not know	34	10.83%
Not Answered	184	58.60%

Draft policy	Topic	Summary of comments	Response
C7		Provide a more thorough definition of "secure", that unambiguously excludes handles removable by anyone with a screwdriver, or the rows of useless ground-mounted hoops around the Kassam stadium.	Examples of good practice for cycle storage are provided within the Car and Bicycle Parking TAN published in March 2022.
C7		Very strongly agree - good bike parking and storage, across a range of bike types, is critical to encouraging an active travelling city.	Noted.
C7		Residential and Non residential schemes should provide equipment and facilities for community owned e:bikes for hire. More stringent rules needed on the location of e-bikes.	The Design Checklist set out in appendix 1.1 requires sufficient pavement space for different users needs. Appendix 7.4 requires bicycle parking to be future proofed to ensure that the infrastructure to support the charging of electric bicycles is supported.

C7		Draft Policy C7 already insists that every scheme hit Oxfordshire County Council's minimum cycle-parking standards—two spaces per bedroom for conventional housing, one per study bedroom for students, plus extra cargo-bike bays, e-bike charging points, showers and lockers in most workplaces . Pushing “higher levels” on top of those generous baselines will consume valuable ground-floor footage, add capital cost and, on tight brownfield	Policy aligns with Oxfordshire County Council's Parking Standards for New Developments. A key aim of the City Council and of the County Council as Highways

Draft policy	Topic	Summary of comments	Response
		plots, force a trade-off with additional homes or lab space. Developers are best placed to judge precisely how many longstay versus short-stay racks, cargo bays or charging sockets their occupants will actually use; market demand and Building Control already penalise schemes that skim on storage. A principle-led policy—secure, convenient, level access, with flexibility for reduced provision where spare capacity exists (as the draft itself allows for student blocks) would keep Oxford cycle-friendly without turning the bike shed into another viability hurdle that slows supply across the city.	Authority is to promote a shift to sustainable modes of travel.

C7		Nice idea, but it goes a bit too far. Tricycles and trailers occupy a great deal more floor space than efficiently stacked pedal bikes.	A key aim of the City Council and of the County Council as Highways Authority is to promote a shift to sustainable modes of travel. The availability of various forms of bike parking is a key tool in achieving this aim.
C7		BMW support the inclusion of bicycle parking design standards, but recommend that the policy acknowledges the local circumstances of business and their operations and phrases the policy to “encourage” rather than “require” since the preferred design options may not always be achievable or necessary.	The targets only apply to new developments, and are considered appropriate in order to meet the City and County Council's key aim to promote a shift to sustainable modes of

Draft policy	Topic	Summary of comments	Response
			travel. In line with the County Council's Parking Standards for New Developments paragraph 1.2, "new developments will need to work collaboratively with Oxfordshire County Council to achieve these targets."

C7		Buses should be the priority over cycling. That's how most people should get around.	Noted.
C7		Indoor bike parking should not be provided indoors.	Noted.
C7	Supportive	Divinity Road Area Residents Association support this policy.	Noted.
C7	Support with suggested amendments	- o This policy should refer to 'Cycle Parking' not 'Bicycle Parking', as this is a more inclusive term. - o The policy reference the guidance on cycle parking quality, inclusivity and security in LTN 1/20, Chapter 11 and the 'Appendix: Specific points from Cyclox update to Oxford City Council Technical Advice Note on cycle parking' below. All of these are important, as people must feel their cycles will be secure to buy and adopt cycling, particularly with more expensive e-cycles. For new developments, internal or hangar type storage should be the standard.	Amendment proposed.
Draft policy	Topic	Summary of comments	Response

		o Appendix 7.4 has an error in use type F1 where it assigns 'student' spaces to museums, libraries and places of worship. These should be covered by the 'Leisure centres, assembly halls, hospitals and healthcare' part of Table 11-1 in LTN 1/20 and have 1 space per 5 employees, plus the greater of 1 per 50m² or 1 per 30 seats/capacity. It should be possible to simplify Appendix 7.4 with reference to LTN 1/20 Table 11-1.	
C7	Comment	Policy reflects existing policy and importantly allows for lower parking standards where justified. This is important as the cycle parking standards can result in excessive provision, leading to inefficient use of land, a proliferation of unsightly cycle stands and adverse impact on heritage assets, particularly in the City Centre. The policy sets out a sensible and pragmatic approach to deal with this issue.	Noted.

Draft Policy	Summary of comments	Response	Outcome

Policy C7 Bicycle and Powered Two-	County Councillors We welcome reference to the County Council parking standards however we would like to request that the	As the city's cycle parking standards are required to support decision-	No Action Required

Statutory Consultee Comments – Draft Policy C7

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

wheelers Parking Design Standards	wording of the policy is such that it can reflect that these standards will be reviewed on a regular basis. Therefore, we encourage the City Council to make reference to the County Council parking standards with an open wording, noting the need to refer to the County as the Highway Authority for the latest standards, instead of including them as an Appendix to the City Plan. Transport Strategy Paragraph 7.15 - we recommend a slight change in language to put greater emphasis on end of trip facilities for cycling. Suggested change to third bullet point: <i>“As well as parking facilities, changing rooms, showers and locker facilities in places of work can be <u>are</u> important in enabling people to cycle.”</i> Incorporating the importance of lighting should be added. In the paragraph relating to bicycle parking, it should also include – bicycle parking should be well lit.	making, it is helpful for them to be included within an adopted Local Plan. While standards do change from time to time, we need to produce a new local plan every five years so would be able to quickly accommodate any changes to standards. While showers, parking facilities and changing rooms are important to some to enable them to cycle to work. They are not used by all and are not always available. As such “can be” is appropriate language in this context. Do not accept proposed amendment. This paragraph suggests cycle parking should be “well-lit” however the proposed amendment to the policy suggests it should be “inclusive”. We	No Action Required No Action Required

Draft Policy	Summary of comments	Response	Outcome
	This removes one of the barriers to access and will improve natural surveillance as well as incorporating bike maintenance stand. Within the policy C7 a slight addition to the wording of the 4th paragraph: <i>“Bicycle parking should be well designed, inclusive and well-located, convenient, secure, covered (where possible enclosed) and provide level, unobstructed external access to the street.”</i> It is important to include children’s bikes within this, they are often overlooked when developing bicycle parking, and to help enable families to cycle all barriers to access should be considered. Children’s bikes are often too small to be locked to standard Sheffield stands as the top bar is too high. See suggestion to 5th paragraph of policy :	do not consider that this suggested change reflects the preceding reasoning/ rationale. As such we do not accept it. In principle, we have no real objection to this amendment, however, are there any specific County Council design standards for Children’s bikes that we can provide to developers? Are they publicly available? Are there any cost implications?	Oxford City Action: consider inclusion of phrase ‘children’s bikes’ within the policy

	<i>"Bicycle parking should be designed to accommodate an appropriate amount of parking for the needs of disabled people, children's bikes, bicycle trailers and</i>		

Draft Policy	Summary of comments	Response	Outcome
	<i>cargo bicycles, as well as facilities for electric charging infrastructure to charge batteries for E bikes."</i>		

South Oxfordshire District Council and Vale of White Horse District Council

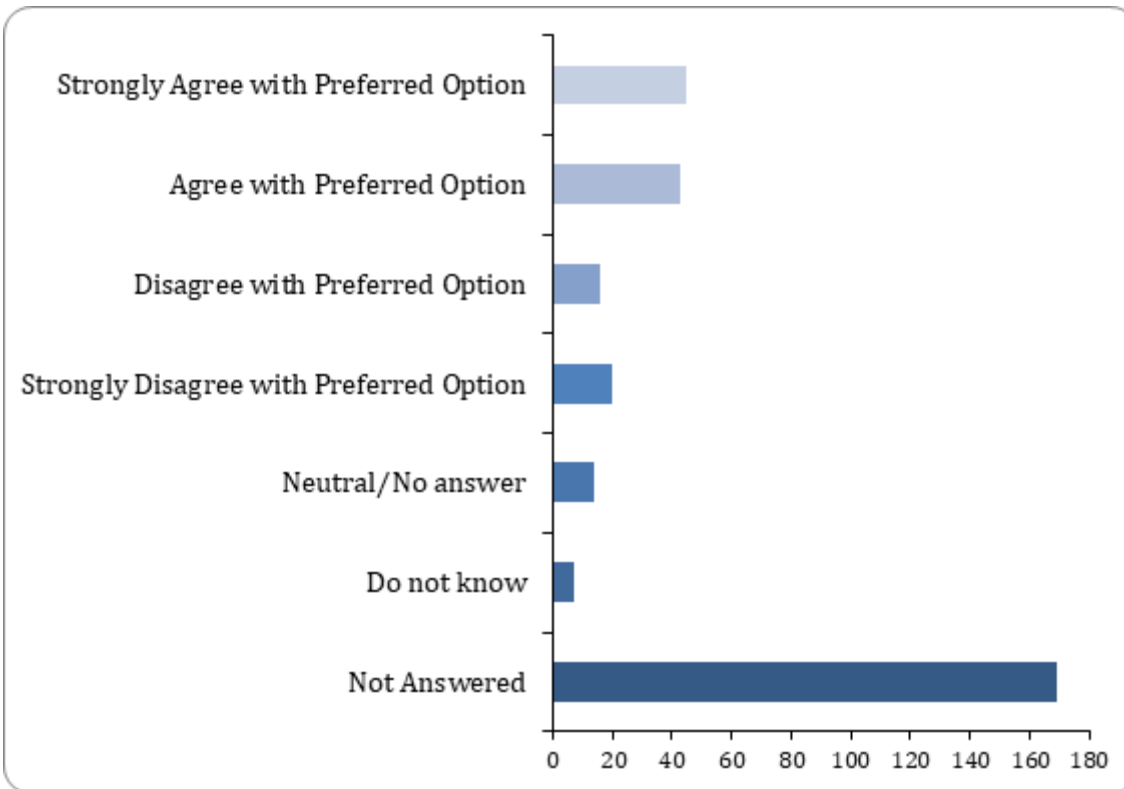
Draft Policy	Summary of comments	Response	Outcome
C7, C8, C9	Numerical or survey style data would be beneficial to justify choices for any standards in these policies. The background paper needs to provide justifications for some of the transport policy choices and standards made in draft policies in the Plan. Your use of Census 2021 data for modal share or origin-destination, rather than the generally more reliable 2011 data, also needs justification.	The policy approaches will be explained and justified in background papers. The Census 2021 represents the most recent data, which it is appropriate to use.	

2600

All Public Responses – Draft Policy C8

Please tell us what you think about policy option set 012d (draft policy C8): Motor Vehicle Parking Design Standards.

There were 145 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	43	13.69%
Disagree with Preferred Option	16	5.10%
Strongly Disagree with Preferred Option	20	6.37%
Neutral/No answer	14	4.46%
Do not know	7	2.23%
Not Answered	169	53.82%

Draft policy	Topic	Summary of comments	Response
C8	Not effective-detailed policy wording	Policy is not effective as the word “scheme” is not defined (in particular for smaller developments such as end of garden development/site split or 2-3 houses). Also “frequency” is not defined by time (e.g. rush-hour versus 04:00 AM) <i>will only be granted for residential schemes* that are low car:</i> The language is unclear What does “only” mean in this context? (1) Homes would have only a ‘small number’ of shared spaces. What is meant by ‘small number’ is not specified. That should be specified as a percentage of the number of homes relying on these shared spaces. The phrase “<i>Seek a reduction</i>” is ineffective. Additional staff or residents will use a variety of transport modes some of which will result in an increase in traffic. A net reduction is therefore required to compensate this. Waffle that belongs in supporting text, a plan is not a goal. Low should not be used to mean ‘no’.	An amendment has been made to change ‘scheme’ to ‘development’, and the asterisk explains what this means. The word ‘only’ is considered to be clear. A small amendment has been made to remove the phrase ‘a small number’- this related to the listed types of spaces that would be allowed, but in that case it is agreed is unnecessary. In accessible locations, where there are existing spaces, a reduction will often be possible and expected.

C8	Out of centre development	Draft Policy C8 should include a presumption against outof-centre developments that would require other than operational and accessible parking. The evidence of the	Additional wording about parking has been added to Policy C1.

Draft policy	Topic	Summary of comments	Response
		retail study supports a 'strong stance' regarding out-ofcentre development. Opposite view also given- that some retailers selling bulky items need to provide parking.	

C8	Restricting residential parking is not the answer and creates issues.	We believe the Policy is badly misconceived in its extreme emphasis on reducing car parking at residential developments. It ignores the obvious fact that car ownership is not solely driven by a determination to drive on congested Oxford roads. Improving public transport will lead to fewer cars. Public transport must be greatly improved first. Delivery vehicles generate as much, if not more, traffic. Some need a car- those looking after elderly, families with children. Residents could not be sure of having anywhere at all to park a car, and would be in constant conflict with neighbours. (2) Outside the deliberately 'low car' schemes, residents will be unable to entertain any visitor that arrives by car.	A key aim of the City Council and of the County Council as Highways Authority is to promote a shift to sustainable modes of travel. The availability of parking is a key tool in achieving this aim. It is important that sites are not isolated and the alternative travel options are available in order for this to be successful, which is why the policy has two options for residential developments.
Draft policy	Topic	Summary of comments	Response

		Stop the anti-car obsession. Priority should be green car, not low car. If there is low car, there must be facilities and connections or anti-social behaviour (e.g. Barton Park).	
C8	HMO parking issues	This policy needs to recognise the existing parking issues associated particularly with HMOs and proximity to district centres. HMO households may have multiple cars (making use of visitor as well as resident permits) and anti-social pavement parking is very common. The only answer is for both universities to restrict students from bringing cars into Oxford (with certain exceptions such as disability, need to travel to work placement etc.) as already happens in Cambridge. We appreciate that this goes beyond the Local Plan process but would like to see our concerns noted to highlight the issue and encourage wider action.	Comment noted. HMOs meet a wide range of housing needs and are not all occupied by students. Provision of parking is considered with HMOs, but car ownership cannot be controlled.
C8	Issue with CPZs not existing over greenfield sites at time of application, and public transport	For 'low car' status, an equivalent to the CPZ and the other criteria should be added for greenfield and brownfield sites as CPZs may not be in place yet. This should require low car status for any area likely to become well served by services and public transport, including through development plans. As such services are required by other policies, this should apply to all major	Additional wording has been added to the policy to clarify this, in response to this concern.

Draft policy	Topic	Summary of comments	Response
	improvements not being in place.	developments. This loophole should be addressed by applying CPZ-equivalent rules to all development sites, and low-car schemes should be expected for all developments across the city.	
C8	Support for low car or no car	Think there will be a surprisingly low car or no car developments. Benefits for children being able to play and travel independently. Some support for completely car free developments. City needs radical reductions in car parking. All new office/lab employment space should only have disabled parking spaces.	The support is welcomed. It is noted that some consider the policy should go further. It is considered that the policy strikes the right balance.

Statutory Consultation Comments – Draft Policy C8

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

Policy C8	County Councillors		
Motor Vehicle Parking Design Standards	We welcome reference to the County Council parking standards however we would like to request that the wording of the policy is such that it can reflect that these standards will be reviewed on a regular basis. Therefore, we encourage the City Council to make reference to the County Council parking standards with an open wording, noting the need to refer to the	See comment for policy C7 above as same rationale/ principle apply.	No Action Required
Draft Policy	Summary of comments	Response	Outcome

	County as the Highway Authority for the latest standards, instead of including them as an Appendix to the City Plan. Public Health This is the only policy which makes reference to 'active travel'. As we stated in our previous consultation response, we believe the Local Plan requires a separate policy dedicated to active travel. Transport Strategy Paragraph 7.16 – health benefits should be included along with others already stated within this paragraph. Place Planning and TDM teams (Central)	Disagree that the plan needs a policy dedicated to “active travel”. All active travel schemes should be included in the IDP Delivery Schedule. If new additional infrastructure schemes are needed to support development proposed in the plan, these should be set out in publicly available/ approved documents in order for them to be included within the IDP. Noted.	No Action Required No Action Required

Draft Policy	Summary of comments	Response	Outcome

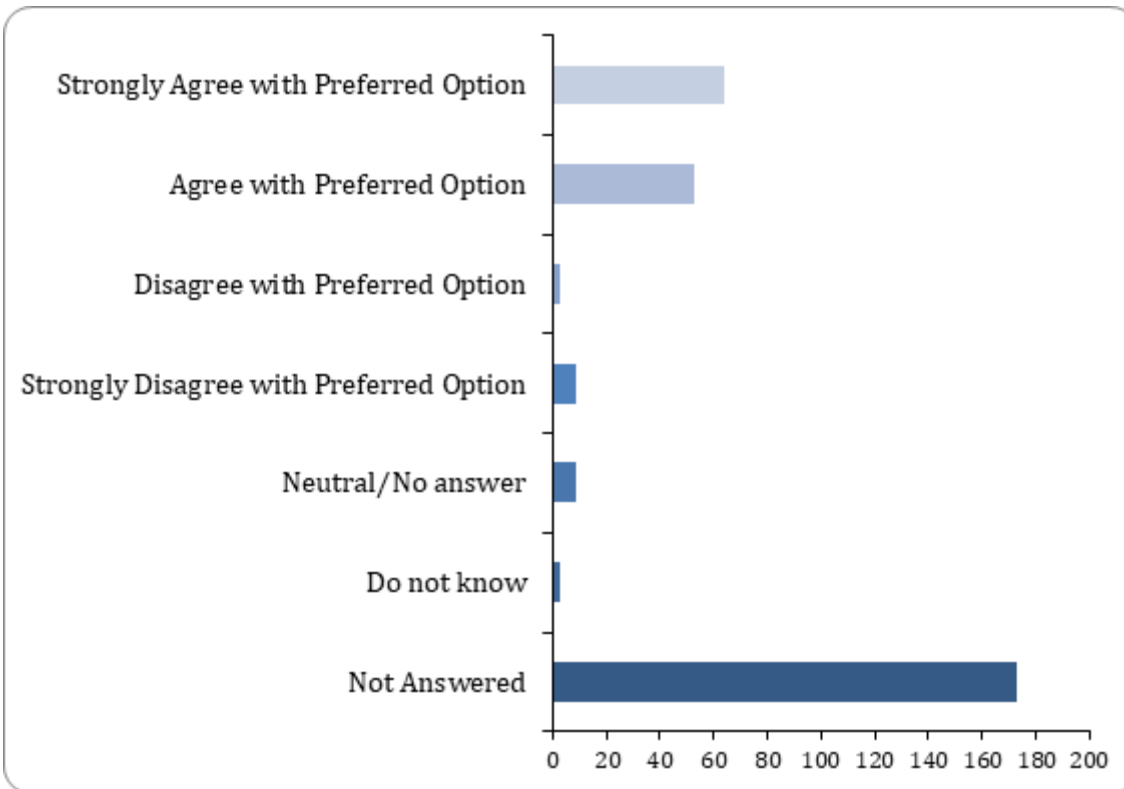
	Some sites coming forward are not on land currently developed, so are not within an existing CPZ. Notwithstanding this, the site still might be suitable for low car as a future CPZ could be introduced and as the proposed site access is already in an existing CPZ, and the site already benefits from good public transport connectivity and is within an acceptable walking distance of a local supermarket or equivalent. Suggest modification to bullet point a) as follows: <i>a) in Controlled Parking Zones (CPZs) or the site access is within an existing CPZ; and</i> The text in the box refers to “TP” throughout but should this be “TA” i.e. transport assessment. The current car parking policy for non-residential uses within LP 2036 (policy M3), in the case of the redevelopment of an existing or previously cleared	We are aware of this issue on certain sites. However, it can be addressed through specific site allocation policy wording rather than an amendment to this policy. Disagree with proposed amendment to bullet point a). This issue would be better addressed through site specific policies. We will look into this issue and update as required. We have strengthened the policy to seek no additional car parking (except for blue badge/ servicing) and at	No Action Required No Action Required Oxford City Action: Review and update as required. No Action Required

Draft Policy	Summary of comments	Response	Outcome
	site, was that “there should be no net increase in parking on the site from the previous level and the Council will seek a reduction where there is good accessibility to a range of facilities”. This requirement, in the case of the redevelopment of an existing or previously cleared site, appears to no longer remain with the level of car parking to be demonstrated through the TA. The County Council fully supports no net increase in car parking in the case of the redevelopment of an existing or previously cleared site and given these can often be in locations which are congested and sensitive to changes in traffic flow. We feel the existing policy should be retained.	accessible sites, we are now seeking a reduction. Any increases need to be justified through the TA/ TP process. We feel this covers a wide range of sites and that specific reference to “existing/ previously cleared sites” is not required.	

All Public Responses – Draft Policy C9

Please tell us what you think about policy option set 012e (draft policy C9): Electric Vehicle Charging.

There were 141 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	64	20.38%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	3	0.96%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	9	2.87%
Do not know	3	0.96%
Not Answered	173	55.10%

Draft policy	Topic	Summary of comments	Response
C9	Policy duplicates Building Regs	EV charging provision standards/ infrastructure already set nationally through Building Regulations. Is Draft Policy C9 necessary? If policy retained, support principle of enabling EV adoption. Agree that requiring a proportion of active charging points is reasonable. A minimum of 10% active provision is considered an appropriate and proportionate amount.	Draft policy C9 has been merged into Policy C8, Motor Vehicle Parking Design Standards. References to the amount of provision have been removed as these are covered by Building Regulations.
C9	Objection – blue badge/ car club requirements	Object to requirement that all new blue badge bays and all car club bays be fitted with live, ready-to-use EV charging infrastructure from the outset. Requirement not justified by evidence of user demand. Risks unintended consequences for usability/ safety and redundant infrastructure. Suggestion that these spaces should fall within the overall 10% requirement.	The provision of EV charging infrastructure is encouraged for blue badge/car club bays to help encourage take up of EV vehicles.

C9	Support for policy	General comments received in support of a policy: • Essential for increasing uptake of EV's • Should be more than just disabled bays – the infrastructure should benefit everyone. • So few homes in the city have off street parking options, creating gullies across the pavements is necessary.	The support is welcomed. It is noted that some consider the policy should go further. It is considered that the policy strikes the right balance.

Draft policy	Topic	Summary of comments	Response
		• Should promote EV ownership rather than no car ownership. • Charging infrastructure must be flexible and widely available so that if necessary, motorists can park and charge their vehicle some distance from their own home.	
C9	Developer provision	On future residential developments, infrastructure for on street charging for EVs should be provided and maintained by developer at no cost to residents.	The charging provisions are set out in Part S of the Building Regulations 2010.
C9	Support for alternate policy	Prefer Alternate Option C	The reasons for the preferred option are set out in policy options set 012e of background paper 012: Transport

C9	Resident parking	For existing residents, be sensible about suggestions for charging when parking is difficult or impossible near or outside their houses (i.e. in terraced housing with onstreet parking).	EV charging infrastructure is required for residential and non-residential development in accordance with Part S of the Building Regulations 2010.
C9	Enforcement	How will on street charging work? Can you ensure that people move vehicles once charged?	This is beyond the remit of the local plan.
C9	Accessibility concern	You should mandate developments to adopt the British Standards Institution's PAS1899, accessible EV charging stations. EV charging is quite problematic for people with disabilities and PAS1899 has clear, valuable	The charging provisions are set out in Part S of the Building Regulations 2010. Oxfordshire County Council's Street Design Guide provides further guidance

Draft policy	Topic	Summary of comments	Response
		recommendations.	on EV charging infrastructure for off plot parking.

C9	EV infrastructure design	EV infrastructure should be well designed and easily available, standards should be realistic.	Infrastructure for the charging of electric vehicles is addressed by Part S of the Building Regulations. This covers both residential and non-residential developments with specific levels of requirements set out for each use. Oxfordshire County Council's Street Design Guide provides further design guidance.
C9	Facilitate EV adoption	The policy does not go far enough to facilitate EV adoption by residents who lack off street parking. The Council needs a policy to resolve this, for which there are several options from Council funded pavement gulleys to lamppost charging to clusters of fast charging stations.	The policy seeks EV charging infrastructure provision in accordance with Part S of the Building Regulations 2010. Oxfordshire County Council's Street Design Guide provides further design guidance on EV charging infrastructure for off plot parking.
C9	Low car housing	Encourage more car free housing then EV charging will not be required. Charging points should be allocated to blue badge holders.	The Local Plan seeks to promote low car housing. Draft policy C9 has been merged into Policy C8 and seeks the provision of live EV charging infrastructure for new blue badge parking

Draft policy	Topic	Summary of comments	Response

			bays on new build residential and nonresidential development.
C9	Support for new parking spaces to be “EV-ready” to lower costs	Mandating a charging point for every dedicated bay, and retro-engineering on-street spaces, adds cost and technical complexity just when the Plan is rightly pushing for low-car or car-free schemes. Developers respond by trimming unit numbers or hiking prices, while the market for EVs is still evolving and rapid-charging hubs are proliferating off-site. A lighter rule would simply require new parking spaces to be “EV-ready” (conduit and power capacity) and reserve full chargers only for Blue-Badge bays and pooled-car slots; private owners can then install hardware as demand materialises. This keeps upfront costs down, preserves streetscape flexibility, and lets Oxford meet both its decarbonisation and housing delivery goals without over-specifying technology that may change faster than the Plan.	Draft policy C9 has been merged into Policy C8, Motor Vehicle Parking Design Standards. The policy includes reference to charging infrastructure being provided in accordance with Part S of the Building Regulations 2010. It also requires all new blue badge and car club parking bays to provide access to live EV charging infrastructure that is ready to use.
C9	EV charging for boats	Consider and discuss the implementation of EV charging for canal boats adjacent to new development with the Canal & River Trust where relevant as this may reduce potential conflict between boaters and residential property occupiers as a result of noise from generators/engines and smoke from stoves at a later date.	Comment noted. Additional text added to Policy H13 point 3 to include reference to EV charging for boats.

Draft policy	Topic	Summary of comments	Response
C9	Policy does not support move towards car-free developments	Hopefully you don't mean this 'on all new residential developments with a dedicated parking space' to say that every new home will need to have a car-parking space of their own?? That would seem to be contrary to the requirements proposed for car-free developments. Make sure it's clear what you mean!	Draft policy C9 has been merged into Policy C8, Motor Vehicle Parking Design Standards. The policy includes reference to charging infrastructure being provided in accordance with Part S of the Building Regulations 2010.
C9	Charging provisions	For new build residential development, the number of charge points to be: one 11kw point per 20 dwellings. For New build non-residential development, the number of charge points to be: one 11kw point per 20 car park spaces	The charging provisions are set out in Part S of the Building Regulations 2010.

Statutory Consultee Responses – Draft Policy C9

Oxfordshire County Council

Draft policy	Summary of Comments	Response	Outcome

Draft policy	Summary of Comments	Response	Outcome
	Oxfordshire's Electrical Vehicle Infrastructure Strategy (adopted March 2021 Oxfordshire Electric Vehicle Infrastructure Strategy) and Policy 29 of the adopted LTCP. As such, we would request the policy is updated to reflect the County Council requirements.		
Policy C9 EV Charging	Strategic Planning We note that this draft policy requires non-residential development to provide only 10% of EV charging infrastructure which is not in line with the County Council requirements of a 'minimum level of 25% for all parking spaces with ducting provided at all remaining spaces to 'future proof' such spaces to be upgraded in the future' as set out in Policy EVI 8 of	10% EV charging requirement aligns with the Building Regs.	Having reviewed the evidence, we have elected to align the % with the Building Regulations.

All Public Responses to the Whole of Chapter 7

Draft policy	Topic	Summary of comments	Response

Chapter 7	Transport	Recommendations of the Citizens Assembly on Transport: While I acknowledge that the City has no direct responsibility for travel, I'm sure the City council can influence County plans and actions. To this end I urge the City council to do more to create better mobility and inclusive transport by following up on many of the recommendations which came out of the recent Citizens Assembly on Transport, including the recommendation to support a rail/bus interchange, the recommendation to support a car-free city centre	Comments noted.
Chapter 7	Community wealth-building	Community wealth-building is both redistribution of financial resources but also development of personal wellbeing and health in our communities. Plan needs stronger	Comment noted.

Draft policy	Topic	Summary of comments	Response
		commitment to importance of social infrastructure and the foundational economy. Any new development should serve & benefit local residents primarily. Also see report on Community Wealth Building across Oxfordshire https://www.oiep.org.uk/big-conversations-oxfordshire-a-county-of-community-wealth-building	
Chapter 7	Omission policy: community-led stewardship	Community First notes policy expectation with regard ‘to the appropriate maintenance/management plans [being] organised as part of the design/construction process’ in policy G2. Yet argues the Plan could be strengthened by explicitly supporting community-led stewardship. This involves working with, supporting, and releasing the skills, experiences and energy of citizens and inspiring projects that reflect what local people want and need. For instance, green space management plans, nature recovery and biodiversity initiatives, volunteering strategies, local food initiatives, links to schools and business, skills development, cultural and historical celebrations, and climate action. The cross-cutting nature of stewardship lends itself to being a new standalone policy, most obviously in Chapter 7.	Agreed these projects sound inspiring. These appear to be largely things that can’t be actioned by the Planning system, and would take place outside of it. The Stewardship Strategy does not seem to be something that could justifiably be required or expected to be implemented, although many of the intended function of it such as maintenance would be covered by a Planning Condition (but the details of how that is managed are not matters for the Planning System).

Chapter 8 – Infrastructure, Areas of Focus, and Site Allocations

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Headlines for Chapter 8:

Infrastructure

- Consensus that infrastructure improvements should occur before planned development, not after
- Need for the Infrastructure Delivery Plan to adequately mitigate the impacts of planned development
- Concern over increases in traffic congestion
- Lack of 5G coverage in Oxford **Areas of Focus**
- General support for overarching, spatial policies **Site Allocations**
- Several site allocations must include re-provision of play and sports areas, entertainment venues, public parking and community centres
- Encouragement to continue to prioritise brownfield sites (those already developed on)
- Concern over potential loss of green corridors in East Oxford impacting biodiversity and wellbeing
- Health risks associated with contaminated land

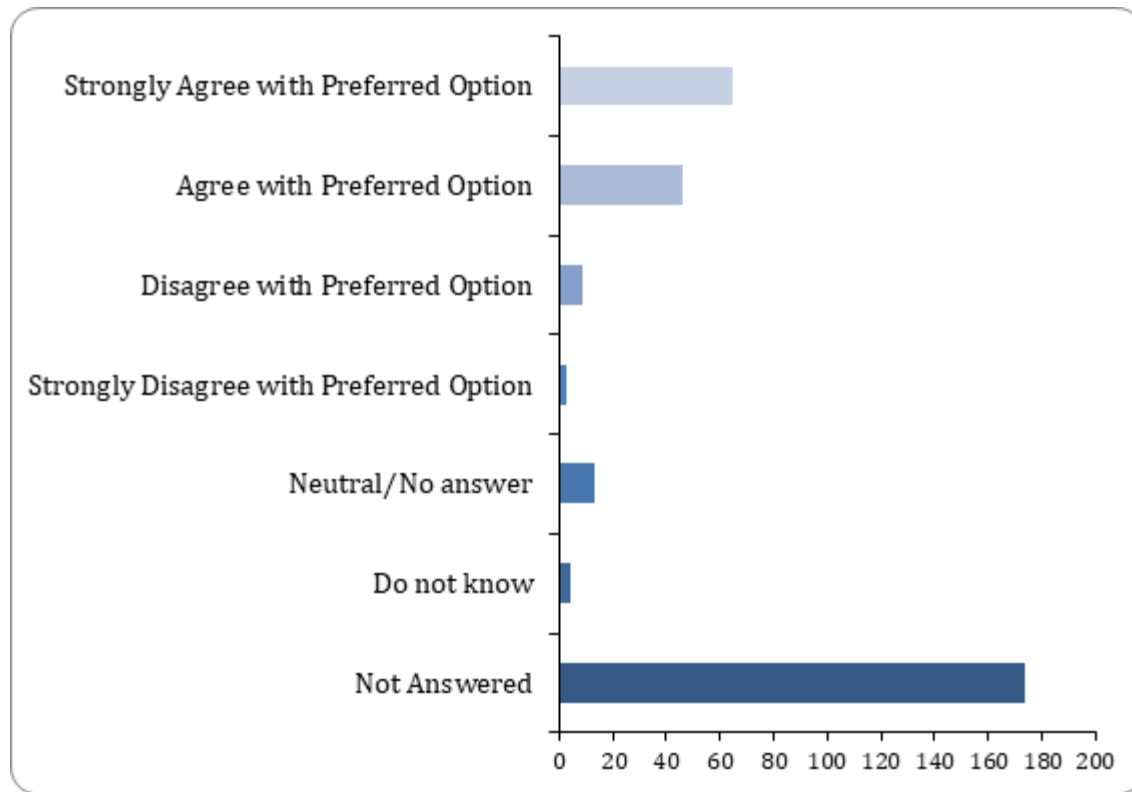
- Concerns over the impact of new high density housing developments on existing communities, such as in Kidlington and Water Eaton **General Comments Collected During Consultation**
- Support for 15-minute city principle
- Transport concerns: park and ride, congestion, anti-LTNs, potholes, stationary traffic outside of Westgate centre, cycle highways, trams etc.
- Council tax is too high due to over-regulation

Infrastructure

All Public Responses - Draft Policy I1

Please tell us what you think about policy options set 014b (draft policy I1): Digital Infrastructure to support new development. If you have any additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	65	20.70%
Agree with Preferred Option	46	14.65%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	3	0.96%
Neutral/No answer	13	4.14%

Do not know	4	1.27%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
I1	Broadband connectivity in new developments	Pre-installing gigabit-ready ducts and risers while trenches are open costs pennies per unit and future-proofs buildings for the knowledge economy Oxford relies on; denying it would mean ripping up pavements later at far higher social and financial cost. Requiring developments to have appropriate digital infrastructure from the development stage will aid accessibility and ensure that needs for later remedial works, with the associated disruption for residents of the city and those reliant on the spaces created, are minimised.	Comment noted.
I1	Scope of policy	• This policy is too narrowly focused on broadband and data centres associated with new developments. The policy framework in the Plan should be broadened to provide for the full range of contemporary digital infrastructure requirements, including digital screens associated with existing developments, which are essential to sustaining the vitality of contemporary city centres and ensuring inclusivity and equality.	The policy already includes requirements for minimising the visual and amenity impacts of digital infrastructure. In combination with other policies of the plan, there are sufficient instruments to ensure that installations are not sited in inappropriate locations or have unacceptable impacts.

Draft policy	Topic	Summary of comments	Response
		• As evidenced through recent planning applications in the city centre, there is pressure for the installation of such technology, many in inappropriate locations, which is likely to escalate. A policy approach, with identification of opportunities in key locations for the installation of digital screens working collaboratively with key city centre stakeholders such as WOA, will ensure that such pressures are managed and such necessary infrastructure can be delivered in an appropriate manner.	
I1	Support with suggested amendments	In I1, Data centres may be a commercial use rather than a digital infrastructure, so might not need for a special mention here.	While they are commercial in nature, data centres are forming an increasingly important element of the digital infrastructure that supports the economy and day to day life, and as such their impact as a sector goes beyond what will be the case for a typical commercial enterprise.

I1	Policy not adequate as written	All new data centres should be required to provide details of likely water and electricity requirements. It is confusing that in relation to R5 that there is a limit on domestic water use but that in relation to data centres which use large volumes of water for coolant purposes no restriction is applied to them as part of the planning process. Similar considerations apply to electricity supply where the grid is unable	Policies R1 (net zero buildings in operation) and R5 (water resources and quality) include requirements for energy and water usage that apply to nonresidential/commercial development, which data centres will fall under. It is also unlikely that such proposals are likely to come forward at a significant scale within the city's boundaries due to spatial constraints that would limit the availability of suitable sites.

Draft policy	Topic	Summary of comments	Response
		to satisfy demand at certain critical periods.	
I1	Objection to data centres	Object to the approval for data centres. These conflict with previous supports intensification of employment land. To my knowledge, data centres do not need to be located near to users and so should be treated in the same way as warehousing.	There is a move by government towards considering data centres and similar facilities as critical infrastructure in support of national and regional economic development. Approvals of proposals will still be on the basis of their being sited in suitable locations and in compliance with other relevant plan policies. It is also unlikely that such proposals are likely to come forward at a significant scale within the city's boundaries due to spatial constraints that would limit the availability of suitable sites.
I1	Specific policy unnecessary	I disagree if this makes it more difficult and costly to build more homes	Building regulations also include standards for broadband ready new homes, which this policy will be in alignment with.

I1	Specific policy unnecessary	Have no specific policy	The NPPF requires local planning policies to facilitate the development and expansion of digital infrastructure. They are also recognised as significant infrastructure in national policy and it is therefore considered appropriate to refer to them as such in the local plan.
I1	Specific policy unnecessary	5G internet is so fast and reliable for the home I'm not sure physical internet connections are so important anymore. It'd be interesting to know how many people are making the switch. Make sure there is decent 5G connection. If you insist on going for a physical connection then I think look beyond 1G, in another 5 years I think that'll look slow, that's not future proof.	Mobile connectivity still requires a level of physical infrastructure to support its operation. Building regulations also include standards for broadband ready new homes, which this policy will be in alignment with.

Draft policy	Topic	Summary of comments	Response
I1	Mandate service conduits	One current issue is that every new development digs another channel under the streets, which collapse and are not properly resurfaced by the Council. (We have 50 or so of those in our street for example.). Would it help to have some policies that pre-position service conduits in key areas, and mandate developers to use those rather than creating yet more surface damage?	Through this policy and other design policies, developers are encouraged to consider the placement and integration of conduits, access points for maintenance etc from the earliest design stages. While the city council is not the highway authority that manages approvals for roadworks (that is the county council), the delivery of buildings that are already futureproofed for digital infrastructure will hopefully mitigate the level of disruption for new development at least.

Statutory Consultees Responses – Draft Policy I1

Oxfordshire County Council

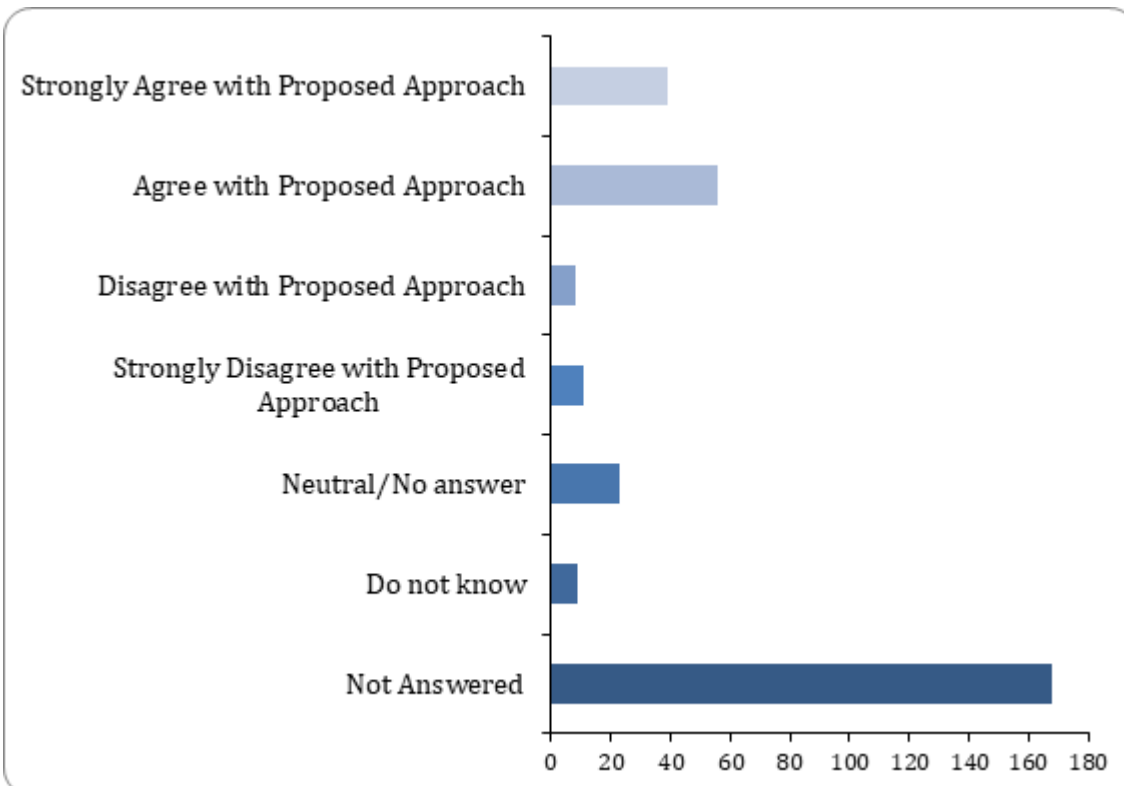
Draft Policy	Summary of comment	Response	Outcome
Policy I1 - Digital Infrastructure	Digital Connectivity Oxfordshire County Council supports this policy however we would request a change to part d) of the policy as follows: <i>“actively ~~where required~~ support the effective use of buildings, outdoor spaces and the public realm to accommodate well designed and suitably located mobile digital infrastructure; minimise impacts of digital infrastructure. on the visual amenity, appearance and character of buildings and surrounding areas, and minimise impacts on the amenity of occupiers and neighbours of development.”</i> This gives more strength to the requirement.	Unclear whether the change “strengthens” the requirement or not. Although it potentially widens its application, it may weaken situations where there an actual requirement to deliver digital infrastructure. Will consider how best to address this this in the next stage of the plan.	Oxford City Action: Consider wording of bullet point d)

Areas of Focus

All Public Responses to North Oxford (Northern Edge of Oxford) Area of Focus

Please tell us what you think about our approach to identifying the North Oxford (Northern Edge of Oxford) Area of Focus

There were 146 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	39	12.42%
Agree with Proposed Approach	56	17.83%
Disagree with Proposed Approach	8	2.55%
Strongly Disagree with Proposed Approach	11	3.50%
Neutral/No answer	23	7.32%
Do not know	9	2.87%
Not Answered	168	53.50%

Draft Policy	Topic	Summary	Response
Northern Edge of Oxford AOF	Collaboration with Wolvercote Neighbourhood Forum	The Plan proposes four 'Areas of Focus' that will each have 'an overarching policy'. One of these is proposed to be 'The Northern Edge of Oxford Area of Focus', which will (presumably, in view of its name) overlap with the Wolvercote Neighbourhood Forum area. However, the vagueness of its name makes this unclear. We are surprised there has been no consultation with WNF about it, and we note there is no mention of the Wolvercote Neighbourhood Plan in relation to it. Seven reasons are given for identifying this Area of Focus, one of which will be provocative to our residents: 'Generally lowdensity suburban development therefore has potential for intensification'. We ask that the Plan makes clear that the 'overarching policy' to be developed for this Area of Focus will be developed in collaboration with WNF, to ensure it fully takes account of the views of its residents.	Reference is made to the Wolvercote Neighbourhood Plan in the introduction to the North Infrastructure Area. The description of the area at Regulation 18 it is considered did make it clear the broad area applicable, and the bullet points of key considerations provided thoughts to respond to.

Draft Policy	Topic	Summary	Response
Northern Edge of Oxford AOF	Support	The approach set out in the policy is supported. It would be useful to have wording to recognise that developments such as Oxford North have already contributed to providing significant improvements to pedestrian and cycling infrastructure as well as public transport.	Comment noted.
Northern Edge of Oxford	Support but no urban sprawl	But need to ensure that this AoF does not become urban sprawl and erode any further into the Green Belt.	The Plan only applies within Oxford City Council's boundary.
Northern Edge of Oxford	Support but need to think about infrastructure	Supports development and understands it is needed, but needs to ensure more infrastructure is built in accordance and improved active transport opportunities	Infrastructure needs in the North of the city are described in the Plan and in the Infrastructure Development Plan.
Northern Edge of Oxford	Disagree with car parking	Disagree with reducing car parking	Comment noted.
Northern Edge of Oxford	Concern about traffic	Transport policies are not strong enough and traffic is an issue in this area, the relocation of the Kassam could worsen this	The City Council is not the Highways Authority and the Local Plan set highways policy.

Draft Policy	Topic	Summary	Response
Northern Edge of Oxford	Concern about water table	Concern about development and intensifying North Oxford because of the impact on the water table across the city	General policies of the plan are concerned with groundwater impacts.
Northern Edge of Oxford	Support and could go further	Encourage an extension of this Focus Area northwards to be 'Science North' cluster as a nationally significant economic asset that demands a measure of cross-boundary cooperation at a spatial strategy level.	The AoF cannot extend northwards a that would be outside of Oxford City Council's boundary .
Northern Edge of Oxford AOF	Align with neighbouring authorities	We support the acknowledgement that this area is adjacent to other urban extension sites in Cherwell District Council and we would urge that on Areas of Focus (AOF) of this scale, the Council works effectively and proactively to ensure there is a joined up approach with neighbouring authorities, to guarantee neighbouring sites work in conjunction with each other and provide the necessary wider infrastructure. Reference should also be made to the close proximity to the Green Belt to this AOF and the important role it plays in providing a green gap between North Oxford and Kidlington. It should be acknowledged that the green belt	Comment noted. The Green Belt area referred to is within Cherwell DC area.

Draft Policy	Topic	Summary	Response
		needs to remain and be protected to ensure the gap is not lost and the areas of development merge into one another.	

Statutory Consultee Responses – North Oxford Area of Focus

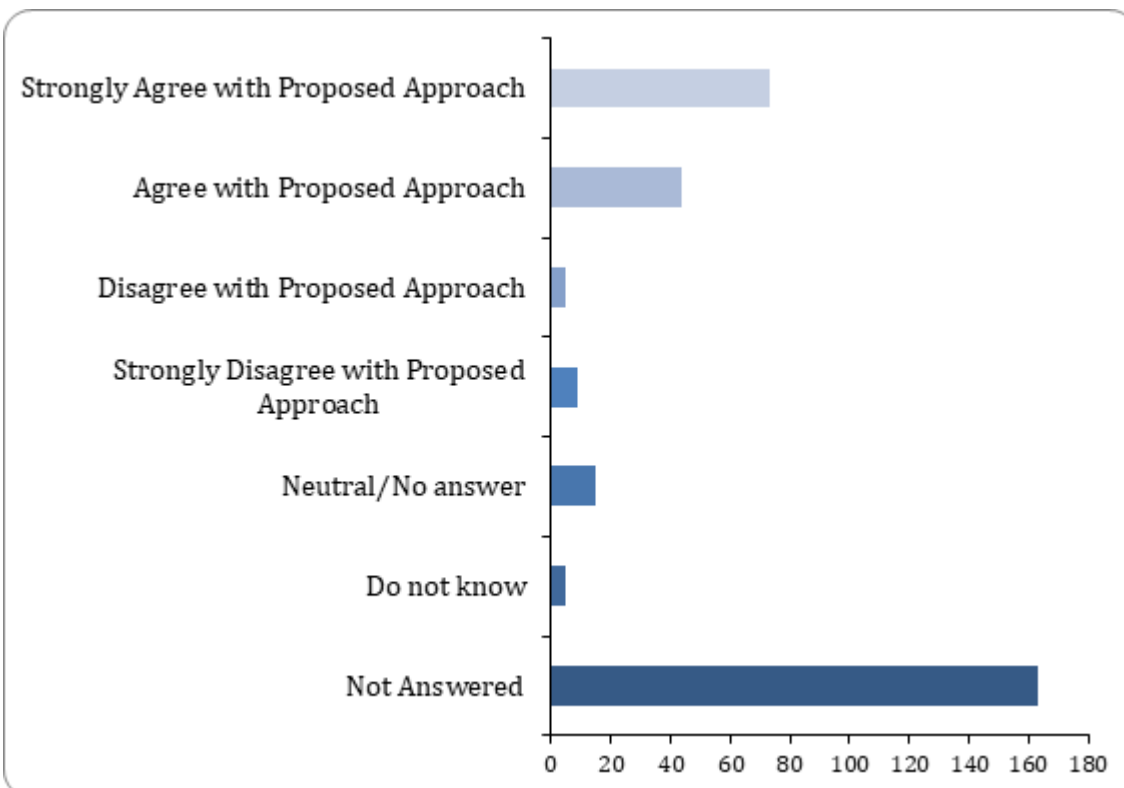
There were no statutory consultee responses to this area of focus.

All Public Responses to South Oxford (Cowley Branch Line, Littlemore and the

Leys Area) Area of Focus

Please tell us what you think about our approach to identifying the South Oxford (Cowley Branch Line, Littlemore and the Leys Area) Area of Focus.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	73	23.25%
Agree with Proposed Approach	44	14.01%
Disagree with Proposed Approach	5	1.59%
Strongly Disagree with Proposed Approach	9	2.87%
Neutral/No answer	15	4.78%
Do not know	5	1.59%
Not Answered	163	51.91%

Draft Policy	Topic	Summary	Response
Cowley Branch line, Littlemore and The Lyes AOF	Support	This area contains several of the city's key employment sites with the Unipart Site adjacent to the Area of Focus. Improved public transport connectivity, including the opening of passenger services on the Cowley Branch Line and the proposed station near Oxford Business Park will offer major opportunity. Many proposed developments are a long way from a station, so the Cowley Branch Line is needed.	General support noted.
Cowley Branch line, Littlemore and The Lyes AOF	Support	Network Rail welcome their inclusion of the Cowley Branch proposal and policy to maximise development value in and around the two proposed stations. Network Rail supports an approach which favours sustainable travel modes. The	Support noted. Added additional text in relation to level crossings.

Draft Policy	Topic	Summary	Response
		oxford station connectivity study has been designed to promote sustainable travel choices for Oxford Station and those stations nearby which also serve travel into the city. This has included a number of cycle parking's around Oxford station and leisure car park to ease pressure within the immediate station environment. It should also be noted that the area surrounding Oxford Parkway station is likely to be subject to master planning activities over the next 12 months. Development sites coming across the area should seek to reduce car parking in line with Policy C8 – Network Rail recognise the ambitions to reduce parking within the Oxford Station area. The station gateway movement	

Draft Policy	Topic	Summary	Response

		principles state plans should aim to limit parking provision where there is good accessibility to a range of facilities. Whilst promotion of sustainable transport methods is favoured, there is currently no provision at Oxford South for car parking, drop off/ pick-up, disable parking or bus links. The non-provision of bus access from Grenoble Road or Shuttle bus from Grenoble housing needs to be considered when providing accessible public transport options. The policy also makes references to the proposed CBL railway stations at Oxford Science Park and in the vicinity of ARC Business Park. In order for these stations to be delivered Mallams footpath level crossing must be formally closed as currently part of the PROW	

Draft Policy	Topic	Summary	Response
		network and the nearby Spring Lane Level Crossing upgraded as an alternative to Mallams as part of the Cowley Branch project. The policy should therefore recognise and reference the need to close this level crossing before the stations can be delivered.	
Cowley Branch line, Littlemore and The Lyes AOF	Support and working in better partnership with south and vale	Good idea but better joinworking is needed. Support for more tree cover and would like to see urban sprawl and green belt is protected.	General support noted. Urban sprawl and green belt are covered under national policies.
Cowley Branch line, Littlemore and The Lyes AOF	Support	Lots of support for more tree cover and policies.	General support noted.

Draft Policy	Topic	Summary	Response
Cowley Branch line, Littlemore and The Lyes AOF	General support	Support but would want to see infrastructure and travel infrastructure significantly improved	General support noted. The policy covers infrastructure improvements.
Cowley Branch line, Littlemore and The Lyes AOF	Disagree with elements	Disagree with high-rise condensed housing and reduced parking. LTNs have made traffic worse and better public transport links are needed.	The policy specifically support improvements to public transport links. The policy explicitly requires buildings of height to be carefully designed and this is also required under other policies in the plan (HD9).
Cowley Branch Line AOF	Templars Square clarification	According to the Preferred Options Draft Policy Map, Templars Square is outside of the Cowley Branch Line, Littlemore and The Lyes AOF. The Templars Square site does however lie within the 1,500m buffer zone of the proposed CBL stations. Being outside of the CBL AOF, we are of the view that financial	As the nearest district centre to the proposed CBL stations, the role and importance of Cowley primary district centre in both serving the local community and local workforce is likely to increase, with associated increases in footfall at the centre. A recent announcement from Govt proposed £120m towards the £155m rail infrastructure costs. However, there is an additional suite of public realm and active travel related improvements which will be sought via S106 contributions, rather than CIL. As such, the plan introduces (through Policy S3) an expectation for financial contributions to be sought from new trip-generating

Draft Policy	Topic	Summary	Response
		contributions associated with the delivery of the CBL would not be sought. We request clarification on this, given the impact such an approach would have on deliverability and viability. Any contributions towards the CBL should be delivered through CIL. It is noted that detailed policies around infrastructure contributions and site allocations are not included in the current consultation version of the draft Local Plan. Further review and comments will be provided when further detail is shared/becomes available in subsequent policy consultations on the draft Local Plan.	development within a 1,500m buffer zone of the proposed CBL stations in order to achieve public transport enhancements in this area including sustainable transport measures, in accordance with the paragraph 58 tests (NPPF, Dec 2024). We have included a specific cost for the "CBL S106 contributions" in our Local Plan Viability Assessment which will be published at the next consultation stage. The area of focus will have its own specific policy, which introduces area-specific policy requirements.

Statutory Consultee Responses – South Oxford Area of Focus

Oxfordshire County Council

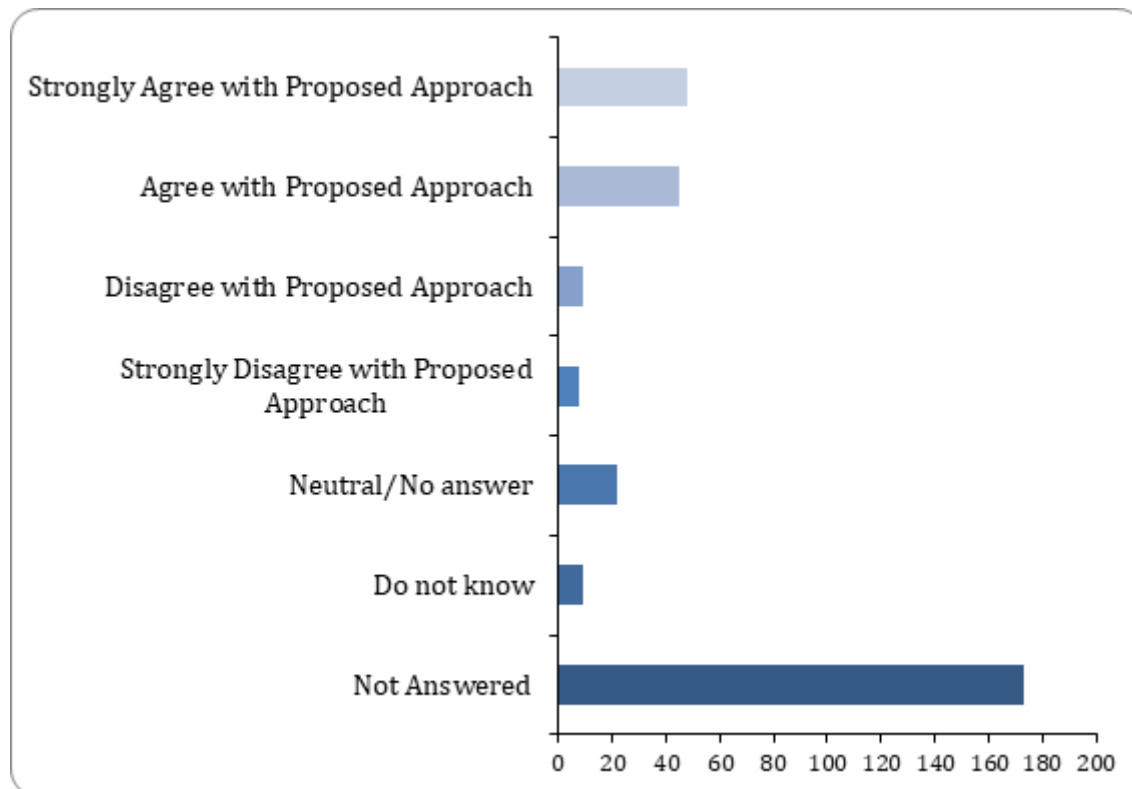
Draft Policy	Summary of comment	Response	Outcome
Cowley Branch Line, Littlemore and The Leys Areas of Focus	Strategic Planning We look forward to seeing the proposed wording for this area of focus, noting that work is underway regarding the Cowley Branch Line (CBL) therefore, the County Council will continue its engagement with the City to assist in drafting a local plan policy which captures the flexibility and requirements to deliver this important piece of infrastructure.	Noted.	No Action Required – see comment in relation to S3 above.
	Place Planning and TDM (Central) There is a need to better integrate employment sites to the city's P&R network. There is a need for existing and future development to be better integrated into the surrounding areas, particularly in terms of walking and cycling.	What infrastructure is needed to deliver these outcomes that is in addition to the schemes included in the IDP? Is it in publicly available documents that we can reference and include? Are the schemes within Oxford city?	No Action Required

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All Public Responses to East Oxford (Marston Road and Old Road) Area of Focus

Please tell us what you think about our approach to identifying the East Oxford (Marston Road and Old Road) Area of Focus.

There were 141 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	48	15.29%
Agree with Proposed Approach	45	14.33%
Disagree with Proposed Approach	9	2.87%
Strongly Disagree with Proposed Approach	8	2.55%
Neutral/No answer	22	7.01%
Do not know	9	2.87%
Not Answered	173	55.10%

Draft Policy	Topic	Summary	Response
East Oxford – Marston Road and Old Road AOF	Support	Centre of Islamic Studies supports inclusion of its sites on Marston Road (Govt Buildings and Harcourt House) within the Area of Focus.	The support is welcomed.
East Oxford – Marston Road and Old Road AOF	Opposition	Opposition to lots of development and losing character of the place. Existing buildings should be at the forefront	The intention of the Local Plan is to manage development but not to prevent it.
East Oxford – Marston Road and Old Road AOF	Concern	Concern about biodiversity and infrastructure in this area and loss of green space Concern about provision of better public transport and active travel routes	These concerns are addressed by the AoF policy.

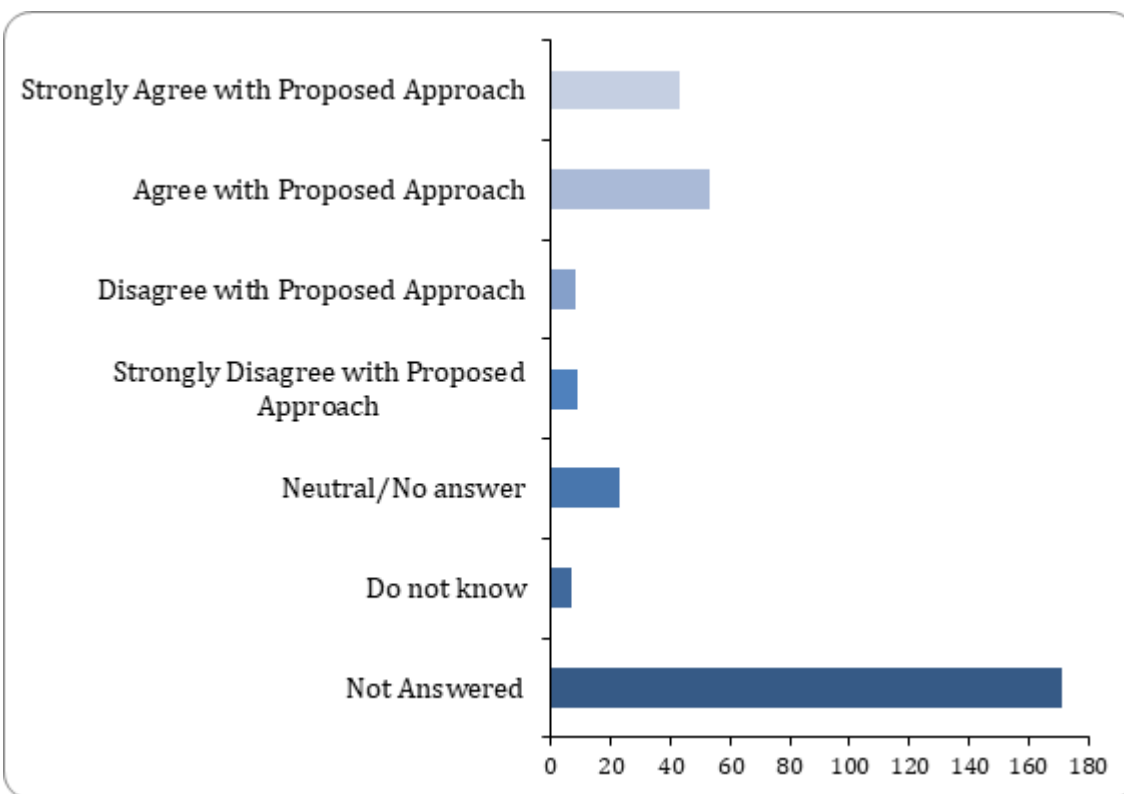
Statutory Consultee Responses – East Oxford Area of Focus

There were no statutory consultee responses to this area of focus.

All Public Responses to University Areas North of City Centre Area of Focus

Please tell us what you think about our approach to identifying the University Areas North of City Centre Area of Focus.

There were 143 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	43	13.69%
Agree with Proposed Approach	53	16.88%
Disagree with Proposed Approach	8	2.55%
Strongly Disagree with Proposed Approach	9	2.87%
Neutral/No answer	23	7.32%

Do not know	7	2.23%
Not Answered	171	54.46%

Draft Policy	Topic	Summary	Outcome
University Areas North of City Centre Area of Focus	General support	General support to this but thinks other areas should be prioritised Better public and active transport needed Protection of green space and urban sprawl Good to communicate with the University	The AoF does not prioritise this area, but is merely an acknowledgement that there are benefits to overarching policies across this area, as there are linked issues best dealt with by the broad policy than by small, individual site policies. List captures some of the issues covered by the policy.

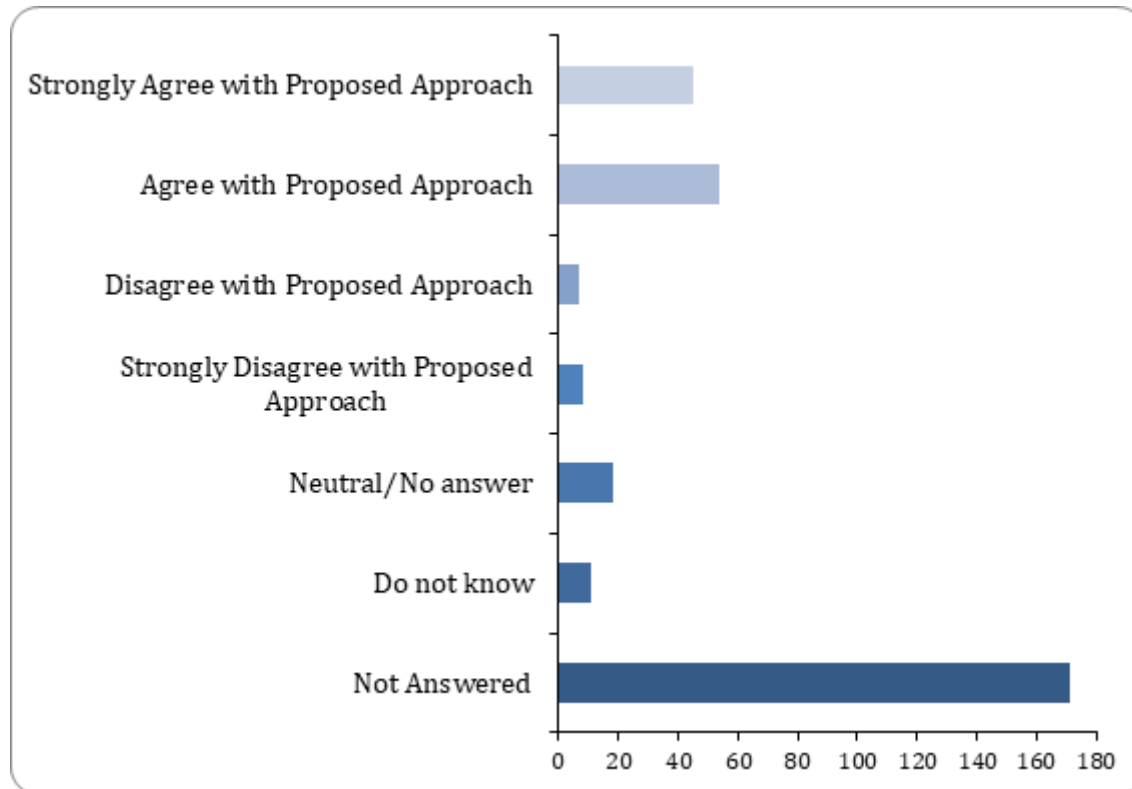
Statutory Consultee Responses – University Areas Area of Focus

There were no statutory consultee responses to this area of focus.

All Public Responses to West End and Botley Road Area of Focus

Please tell us what you think about our approach to identifying the West End and Botley Road Area of Focus.

There were 143 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	45	14.33%
Agree with Proposed Approach	54	17.20%
Disagree with Proposed Approach	7	2.23%
Strongly Disagree with Proposed Approach	8	2.55%
Neutral/No answer	18	5.73%
Do not know	11	3.50%
Not Answered	171	54.46%

Draft Policy	Topic	Summary	Outcome
West End and Botley Road AOF	Nuffield Sites	A key objective for the Nuffield sites is for the masterplan to be a commercial led proposition which has the ability to revitalise the route from the station to the City Centre and to make a significant contribution to the creation of a wider Innovation District in the West End. The withdrawn 2040 Plan identified the West End and Botley Road AOF as ‘an appropriate location for employment-related development opportunities which seek to build on Oxford’s key economic strengths that link research, education and social enterprise in areas such as life sciences and energy. Given the high demand for commercial research and development space and specific developer interest, it is likely that this sector will be the main river of development across the area’. It also stated that ‘there are also opportunities to accommodate a range of other sectors and uses, such as the creative and digital industries, as well as affordable workspaces for startups, co-working spaces, or even community uses where feasible across the wider area that this AOF covers’. These aspects of the withdrawn Plan	The Council has maintained a dialogue with landowners in relation to policy development. We have reviewed these comments and taken them into account when producing the Area of Focus Policy.

Draft Policy	Topic	Summary	Outcome

		continue to be supported by Nuffield as relevant for inclusion in the 2042 draft Plan, subject to viability considerations as outlined above. The Nuffield Sites are fundamental in supporting the delivery of an Innovation District in this key part of the city and assisting to realise the potential of Oxford's West End by supporting Oxford's knowledge economy, provision of commercial space and providing opportunities for a variety of occupiers from SMEs and startup businesses, research and development/life sciences occupants to head quarter office spaces. There is also the additional benefit that they are all in a single ownership allowing the owner to think strategically about the nature of the uses on parts of the sites, thereby promoting a Masterplan. Given the importance of the new Local Plan in establishing the planning policy framework and policy platform for the Nuffield West End Masterplan, it is important to ensure the 2042 Local Plan is sufficiently defined on site specific aspects whilst providing the necessary flexibility when applying wider Local Plan planning policies to such site proposals, to ensure they	

Draft Policy	Topic	Summary	Outcome
		are able to successfully deliver a transformational development, new living accommodation, employment growth in the form of a new innovation district at the Nuffield Sites and enable the delivery of significant benefits for the community and for Oxford.	
West End and Botley Road AOF	Osney Mead	OULD continues to strongly support the inclusion of Osney Mead in the West End and Botley Road Area of Focus and the recognition in the draft Plan of the significant development and regeneration opportunities here.	The support is welcomed.
West End and Botley Road AOF	Support	Strongly supportive of development of Oxford's West End.	The support is welcomed.
West End and Botley Road AOF	Views/Building heights	Development within the West End and the Botley Road needs very careful management to prevent detrimental harm to the views out towards the western hills from the city centre, and views back from the western hills towards the historic city centre. This is a highly sensitive location – with Botley Road sitting within some of the key historic defensive views out from St Georges Tower to the west. More specific reference needs to be made to this to ensure buildings will be limited to appropriate heights.	These concerns are addressed through a combination of the AOF and other policies in the plan.

Draft Policy	Topic	Summary	Outcome
West End and Botley Road AOF	Support	BL supports the recognition that that the West End and Botley Road Area of Focus will see significant development and regeneration opportunities.	Support noted.
West End and Botley Road AOF	Network Rail	Network Rail supports the allocation of the West End and Botley Road area as an 'Area of Focus' and the recognition that: a) 'The redevelopment of Oxford railway station presents the opportunity to create an easy and attractive transport interchange between rail, bus and active travel; and b) 'There is a significant opportunity to create highdensity urban living with good provision and access to open space and a vibrant mix of uses, and also that make a significant contribution to the knowledge economy'. Network Rail would encourage any future draft wording for the proposed Area of Focus to reflect the acknowledgements outlined above to enable the area to reach its full potential.	Support noted.

West End and Botley Road AOF	General support but concern about infrastructure	Efforts need to ensure environmental, cultural, societal and commercial impacts Car parking needed. Concern about all infrastructure and transport infrastructure	These concerns are address by the AOF (where releveant), and by othe specific policies in the plan.
Draft Policy	Topic	Summary	Outcome
West End and Botley Road AOF	More homes needed	More homes needed to support development	The plan's over-arching strategy prioritises housing.
West End and Botley Road AOF	Support	Commentary supporting as this area is already built up with significant retail and commercial areas	Support noted.
West End and Botley Road AOF	Concern about flooding	Concern that majority of this area is in flood zone 3b	Policies elsewhere in the plan address flood risk. We have produced a Strategic Flood Risk Assessment which provides flood risk maps for the city.

Statutory Consultee Responses – West End Area of Focus

There were no statutory consultee responses to this area of focus.

Comments on All Areas of Focus

This section contains all comments received regarding all areas of focus, including public and statutory responses.

Topic	Summary	Response	Outcome
AOFs	Options do not consider opportunities outside of city boundaries	The Draft Plan identifies Areas of Focus. There is a critical omission in the options presented in that it does not consider opportunities for expanding beyond the city's boundaries. In reviewing the reasons for identifying the areas as presented, supporting the regeneration of existing areas within Oxford, supporting infrastructure investment – would all equally apply. The draft Plan refers to ongoing discussions with neighbouring authorities and identification of areas of focus beyond the city's administrative boundaries would assist and focus discussions.	While the surrounding context and other activity in neighbouring districts may be taken as one of the wider considerations, the spatial and allocation policies within the plan can only apply within the local planning authority boundaries.

AOFs	Scope of AOF beyond site allocation	ChCh generally supports the proposal to identify several 'Areas of Focus. The 'West and Central Area quadrant of the City' quadrant includes the 'West End and Botley Road Area of Focus'. ChCh agrees that this area "offers some significant development and regeneration opportunities". ChCh notes that the Areas of Focus have huge potential to help deliver the housing and economic needs of Oxford, in	The AoF policies cover issues relevant across a larger area, with multiple sites and also areas that are not identified sites or don't have a site allocation policy.
Topic	Summary	Response	Outcome
		particular the West End and Botley Road area. However, it is not clear from the Draft Document for consultation what these Areas of Focus will cover over and above any site specific allocation policies.	

Oxfordshire County Council

Topic	Summary	Response	Outcome
Areas of Focus	Place Planning and TDM (Central) We welcome the opportunity to review overarching and area specific policy.	Noted.	No Action Required

Site Allocations

This section contains all comments received regarding site allocations, including public and statutory responses.

1c – Red Barn Farm No comments.

1a1 - Northern Gateway (Oxford North)

Site no.	Site name	Summary	Response
001a	Northern Gateway	Objection – Do not allocate due to traffic, environmental (proximity to SAC) and economic reasons. This is directly next to the A34 the most congested and underspecified arterial route in the country, this will have severe countrywide negative impacts.	A lot of development in this area is already permitted and built out. This was supported by significant transport infrastructure works.
001a	Northern Gateway	Support - ONV supports the allocation of the Northern Gateway area within the Local Plan. At this stage the proposed wording for the final policy has not yet been provided. However, discussions are ongoing with various parties with regard to these policies. In relation to Oxford North, whilst ONV recognises the wider need for housing in Oxford, the focus of Category 1 employment sites must be for employment uses and housing should be located elsewhere, including using the	Not all of the housing part of the hybrid application has yet come forward.
Site no.	Site name	Summary	Response

		strategy of meeting the need in adjacent districts with efficient transport routes to the employment sites. This has already happened in the context of the Northern Gateway, through the Cherwell Local Plan Partial Review – Oxford’s unmet Housing Need plan that allocates circa 4,500 homes to the north of the development. Such housing will provide sufficient housing to meet the labour demands for Oxford North without diluting the site’s potential to boost the supply of jobs locally. We believe that the Council should look beyond its boundaries to address such issues.	

1e - Pear Tree Farm

Site no.	Site name	Summary	Response
001e	Pear Tree P&R	Among the already allocated sites there are three within our area: OUP Sports Ground; Northern Gateway; Peartree Farm. We ask that it be made clear that development at the last of these is conditional on a direct pedestrian/cycling route being constructed to link the site to Parkway station, which will require collaboration with Cherwell District Council.	This connection is noted as important in the draft allocation policy.

6b - Banbury Road University Sites – Parcel B No comments.

8a - Bertie Place Recreation Ground

Site no.	Site name	Summary	Response
008a	Bertie Place Recreation Ground	Whilst we are aware that the site has previously been allocated for housing, this should not come at the expense of a public playground for children and families, which it is not intended to replace like for like. Other sites should be explored which does not result in the loss of a well-used community facility	All suitable and available sites with development potential are being considered as part of our efforts to address the city's housing need. The plan also recognises the importance of public open space, and other forms of green infrastructure. The allocation policy seeks to balance between providing housing on a suitable site and ensuring that the key function of the site as a public open air recreation ground is retained.
008a	Bertie Place Recreation Ground	Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	The designated core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces'). Development schemes affecting supporting

Site no.	Site name	Summary	Response

			spaces, such as Bertie Park, will be required to reprovide affected spaces to the same standard or higher (see responses for policies G1 and G2).
008a	Bertie Place Recreation Ground	The considerable difficulties with the reprovion of the site have led OCC to suggest inclusion of Bertie Park as a site for development in the 2042 plan without the inclusion of a planning condition requiring re-provision. The impossibility of complying with NPPF s.104 means that grounds for its inclusion should be re-visited. It should not be re-included solely on the basis that it has been on the plan for a quarter of a century. Or that we have been consulted before.	The allocation policy specifically includes a requirement for reprovion of the existing playground. Reprovion will also be a requirement for any scheme to be compliant with the policies in the emerging plan (see policy G2). We consider this approach is compliant with national policy, this is addressed in more detail in the sections dealing with green infrastructure, policies G1 and G2 in particular.
008a	Bertie Place Recreation Ground	1. Flooding. All advice from the Environment Agency indicates significant increase in flooding 2. Safety. Advice from the police is that alternative recreation area is not a safe place for children to play.	The allocation policy includes site specific requirements for surface/ground water assessments, incorporated sustainable drainage systems and
Site no.	Site name	Summary	Response

			management plans to deal with surface water flooding risks. The policy requirement with respect to the reprovion of current recreation facilities is that the playground is within the site boundary, at the same standard or higher (see policy G2), and it is expected that sound design principles such as those included in guides such as Secure by Design are followed.

11 - Canalside Land, Jericho

Site no.	Site name	Summary	Response
011	Canalside Jericho	Nothing's happened for so long. The view of the church from the towpath should not be blocked by housing. This is on the canal, built for boats, and should be a boatyard. There are few spaces along the canal to sit and enjoy it. An open square, greenery, cafes and a wharf are more appropriate for the site.	It is likely some enabling development would be needed to bring the site back into use.
Site no.	Site name	Summary	Response

011	Canalside Jericho	The community and councillors have been very clear for many years that they need a new community centre, a public square and a boatyard, and it must be accepted that there won't be much room for housing. Definitely not student (especially speculative) house.	Comment noted.

12 - Churchill Hospital

Site no.	Site name	Summary	Response
012	Churchill Hospital	Proximity to Lye Valley (abutting Lye Valley North fen) means that future of the site is of crucial importance to the fen ecology and water supply. Maintaining calcified alkaline groundwater supply to Lye Valley needs to go into the site-specific policy for the Churchill site.	Comment noted.

012	Churchill Hospital	BBOWT welcome that this allocation no longer includes the meadow, which is an Oxford City Wildlife Site. The meadow is not only vitally important in relation to the Lye Valley but is also subject of an ecological compensation scheme for a housing development in Littlemore. Nevertheless, any development on this site is of the utmost concern with respect to the Lye Valley. Any development on existing urbanised surfaces will still need a whole suite of measures to ensure there is no impact on the SSSI and LWS. It is on surfaces that are currently green and free draining that any development would have most impact on the hydrology of the meadow through reducing the evening out effect that such green surfaces have on the amount of water flowing into the fen, which is particularly vulnerable to severe and permanent damage from shortterm very high water flows. This matter is well dealt with in the detailed study in the evidence library on the Lye valley and there is no need for us to expand on it here. Development on green surfaces also may well lead to less water flow during dry periods causing the fen to dry out, and impacts on water quality which also can have a highly negative impact on the fen. In our opinion therefore no development on currently green surfaces should take place on this site.	The site allocation policy will state that development proposals will need to avoid adverse effects on the SSSI. This is also required under Policy G6 of the plan.

012	Churchill Hospital	Protected species constraints go beyond nesting birds and roosting bats. The most recent planning application on the site identified presence of reptiles (e.g.viviparous lizards), a number of which had to be captured and translocated to a specially built refuge on the site edge nearer the SSSI. Also, proximity to Lye Valley suggests slow worms and grass snakes could be present on site (as they are found in the valley). Thus, reptiles should be added to protected species constraints flagged in policy. Note that wording of sentence in relation to species constraints in reg 18 is incomplete.	We have conferred with ecologists, and the policy has been updated to include reptiles.

012	Churchill Hospital	Parking Issues: The hospital has a total of 1506 parking spaces compared to a total of 2270 across whole of city centre. 4646 car parking spaces exist across the three hospitals with 70% allocated to staff. Modification Requested: (Rep relates to LP2040 Policies) References to Policies G1, G3, G5 are not relevant and are not related to the SSSI – Policies G6 and G7 Many specific statements about the Lye should NOT be included in the Site allocation policy but should be applied more generally (See comments on Policy G6+G7). Reduce parking in exchange for further development as discussed (Response R6 – Air Quality) The phrase “issues including parking are considered in a comprehensive way to make the most efficient use of land.” should be amended to: “in a comprehensive way to make the most efficient use of land, address the climate crisis and realise essential health, social and environmental benefits.”	Policies G1 – G3 and G6 are referenced in the site allocation policy as all are relevant and applicable to developments on this site. The site allocation policy also provides some additional detail in relation to the SSI and future development on this site.. The site allocation policy references potential contamination of hospital and historic uses on the site. Wording relating to parking and efficient use of land has been updated. Development proposals will be considered against requirements set out in the plan as a whole which would include landscaping

		“A buffer zone should be provided during the construction period to avoid disturbance to the adjacent SSSI.” Add “in operational phase” “because of the use as a hospital some areas of potential contamination are present on the site” – site contamination is mostly caused by asbestos and WWII contaminants, not hospital use. WWII buildings and assets must be identified and retained.	buffers and impacts on the SSSI during operational phases. The site allocation policy specifically references the WWII buildings as non-designated heritage assets which should be enhanced.

14 - Templars Square

Site no.	Site name	Summary	Response
014	Templars Square	Crucial to local life and being allowed to die store by store. We need the shops in a warm and accessible indoor centre.	The draft allocation policy is clear that the centre must keep its district centre function, although retail specifically is not its own use class in the planning system anymore. However, being covered or not will be a detailed

Site no.	Site name	Summary	Response
			design decision and is not a requirement of the policy.

16 - Cowley Marsh Depot No

comments.

17 - Crescent Hall

Site no.	Site name	Summary	Response
017	Crescent Hall	Comment: Substantial Roman pottery activity has been identified in the general area.	The potential for the site to contain archaeological remains is low to moderate. (The site is within a very large zone of general potential for Roman kilns).

18 - Diamond Place and Ewert House

Site no.	Site name	Summary	Response

018	Diamond Place and Ewert House	Site should include medical facilities if possible.	The draft allocation policy lists healthcare uses as a suitable use on the site.

20b2 - Elsfield Hall, Elsfield Way

Site no.	Site name	Summary	Response
020b2	Myers Briggs, Elsfield Hall, Elsfield Way	We are pleased to see a proposal to convert the existing office accommodation to residential, which will be more appropriate at that location.	Support is welcomed.

21 - Faculty of Music, St Aldates No comments.

24 - Government Buildings & Harcourt House

Site no.	Site name	Summary	Response
024	Government Buildings and Harcourt House	Very important that any development have very minimal impact on the character and sense of seclusion of Headington Hill Park. Windows of buildings overlooking the park would have significant detrimental impact.	The importance of the interface with the park is noted in the draft site allocation policy.

Site no.	Site name	Summary	Response
024	Government Buildings and Harcourt House	It is noteworthy that this site has remained vacant for a very long time and that the Policy SP16 was prepared in 2016 so 9 years ago and the site had been vacant for at least 10 years before that. This is an attractive spot in a prosperous part of the City there is absolutely no reason why it could not have been redeveloped years ago and yet the Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment.	The landowner has stated their interest in developing this site during the plan period.
024	Government Buildings and Harcourt House	The introduction of additional requirements (e.g., building performance/ ecology), on sites with longstanding viability challenges is likely to hinder redevelopment	Whole-plan viability testing has been carried out.
024	Government Buildings and Harcourt House	Welcome acknowledgement of the lawful employment use on site. We would wish to see the full range of uses set out under existing OLP2036 policy SP16 carried forward including complementary uses.	Noted. We will consider suitable uses for the site that align with our overarching strategy. LP2036 recognised Harcourt house as an employment site (Cat. 3). LP2045

Site no.	Site name	Summary	Response
		The Centre maintains an aspiration to include commercial research and development use within a site redevelopment to complement academic research. The commercial activities would be 'spin out' application of academic research as is the norm in the modern academic arena owing to obvious benefits from the co-location of cutting-edge academic research and its commercial application. The current Local Plan which allows for complementary uses has been important in allowing the Centre to advance development proposals.	considers Harcourt House as a "non-designated" employment site and introduces specific criteria relating to the redevelopment of non-designated sites outside of the city and district centres.
024	Government Buildings and Harcourt House SA Form	Disagree with negative rating against SA objective 11. The site contributes little to the character of the area and could be seen to detract from the heritage asset. Redevelopment of the site presents an opportunity to enhance the area, which should be viewed positively.	The reason for the negative SA rating on the SA Form is because in its current state, the site, as you point out, "contributes little to the character of the area and could be seen to detract from the heritage asset".

26 - Jesus College Sports Ground (Herbert Close) and 32, 234 - Lincoln College and Jesus College Sports Grounds

Site no.	Site name	Summary	Response
026, 032, 234	Jesus and Lincoln College Sports Grounds	These are key green spaces with woodland providing biodiversity and landscape value.	The draft site allocation policies note these features and require significant retention of green infrastructure.
026 and 032, 234	Jesus College Sports Ground and Lincoln/Jesus College Sports Grounds	We assume that the reference to site 234 is an error as this site is not allocated in the Adopted Local Plan 2036. We appreciate that sites 026 and 032 are allocated in the existing Adopted Local Plan but we think that these allocations should be reconsidered because of the potential impacts of housing development on land that is now covered by green infrastructure policy G1. The arguments are very similar to those presented for Oriel College Sports Ground above, especially in relation to effects on the setting of the Conservation Area, visual prominence and loss of habitat connectivity. If, contrary to our preference, allocations here are confirmed, the City Council should ensure strong developer contributions, for example for provision of public outdoor space and biodiversity net gain. Affordable housing for NHS and university staff at the nearby Old Road Area of Focus (Warneford, Churchill, Old Road Campus) should be prioritised.	The sites do need to be developed carefully, reflecting the sensitivity of the conservation area. The draft site allocation policies are drafted to ensure this happens.
026	Jesus and Lincoln	Do not support the inclusion of a policy.	

Site no.	Site name	Summary	Response
	College Sports Grounds	Cowley is the most green-space-deprived suburb in Oxford. According to a study undertaken in 2006 it had only 1.14HA per 1000 residents in 2006 of a city-wide average, then, of 5.75HA, and with a now 11.2% population increase. This is the last large sports facility following the loss of other green space in the area. There is no suitable alternative available. Retaining some of the sports provision is NOT sufficient as it will not be adequate to service the needs of all at peak times, which invariably will mean residents can only use them at unpopular times. Most alternative sites to relocate sports facilities are already earmarked for development.	The data presented by the respondent was taken from a City Council study from 2006. The figures presented (both for Cowley and the city-wide average), relate to “publicly accessible green space”. While reference was made to the city-wide average of 5.75ha per 1,000 population within the Oxford Core Strategy 2026, <i>that</i> Plan sought to maintain an overall average of 5.75ha of publicly accessible green space per 1,000 population and set out clearly that, while it was desirable that this standard was maintained, it should not necessarily be applied as a requirement within all new developments and was, at that time, used as a basis to support onsite open space provision within larger developments.

Site no.	Site name	Summary	Response
			The desire to maintain 5.75ha of publicly accessible green space per 1,000 population was not carried forward into OLP2036. Regardless, Jesus and Lincoln College sports grounds are both private open-air sports facilities/ private open space. LP2042 proposes that both sites are wholly “supporting GI”. Site allocation policy wording will be drafted to ensure appropriate re-provision of sports pitches.
026	Jesus and Lincoln College Sports Grounds	BBOWT disagree with the site allocation as it is in the Oxford Green Infrastructure Network. Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	Noted.
032	Lincoln College Sports Ground	Sports grounds are important to university culture and should be preserved. Already a very large student block	The policy does require that sports provision is retained or re-provided.

Site no.	Site name	Summary	Response
		nearby so concerned about adding to the high concentration.	
032	Lincoln College Sports Ground	Lincoln College support proposed site allocations in the Plan drawn primarily from previously allocated sites in the Oxford Local Plan 2036 and sites that were being considered in the (now withdrawn) Oxford Local Plan 2040. It is, however, important to note that the sites owned by Lincoln and Jesus Colleges are separate and therefore it is vital that each College is able to deliver each site individually and separately.	The Jesus and Lincoln Sports Grounds are proposed as separate allocations in the draft site allocation policies.

27 - John Radcliffe Hospital

Site no.	Site name	Summary	Response
027	John Radcliffe Hospital	The SA form says the site is within the setting of a conservation area, but part of it is within a conservation area, so this needs correcting. Surface water flooding has been a serious issue recently, particularly in car park T.	SA form updated. Policies require that development proposals consider and mitigate for surface water flooding.

027	John Radcliffe Hospital	Key issues for this site are as follows: Onsite Parking	It is agreed that surface-level parking is not an efficient use of land. New buildings and hard standing better manage surface

Site no.	Site name	Summary	Response

		• Creating increased demand for housing • Huge basements which remove water retention capacity of land The hospital has a total of 2600 parking spaces compared to a total of 2270 across whole of city centre. 4646 car parking spaces exist across the three hospitals with 70% allocated to staff. The football fields of parking lead to: • • Environmental and health issues due to traffic generated • Flooding in Marston and Northway due to vast surface level parking • Prime housing land wasted, which in turn would reduce the need to travel <i>(Policy references are to LP2040 policy)</i> Policy includes no targets to reduce parking provision	water runoff, and policy approaches require this. Parking should be rationalised to reduce unnecessary circulating and queuing around the site, and to reduce the amount of space it takes up. The level of parking will have to be strongly justified, with mitigations to avoid worsening wider impacts.

Site no.	Site name	Summary	Response

		There are long-standing surface water flooding issues in Northway relating to the John Radcliffe Hospital site. Future policy needs to be stronger and require a reduction of surface water flooding issues rather than seeking appropriate mitigation measures. Old Headington Conservation Area Appraisal does not discuss the John Radcliffe Hospital - it ignores it! Modifications proposed (<i>reference is to LP2040 policy</i>) • remove justification for retention of car parking based on need, instead it should reduce queueing, • parking should be replaced by development • “issues including parking are considered in a comprehensive way to make the most efficient use of land.” Amend to: “in a comprehensive way to make the most efficient use of land, address the climate crisis and realise essential health, social and environmental benefits.” • Protection and mapping of JR Green as Core Green Space	
Site no.	Site name	Summary	Response

		• Protection of Cuckoo Lane, Listed Walls, Treelines, significant view lines • Removal of confusion around reduction and mitigation of flood risk in favour of reduction or “net-zero” • Enforce use of SuDS and other systems with policy specifying that civil action will be taken if runoff continues • “ • Ostler Road and Ostler Way” is Osler Road, “Sandford Way” is Sandford Road. • Clear parameters for the protection of Cuckoo Lane, Listed walls and original John Radcliffe building and heritage barn near Osler Road/St Andrews junction • “ • There is a helipad on the parkland grounds behind Headington Manor House” – No - This was temporary and removed. • Update wording that JR is partly inside the OHCA.	

28a, 28c - Kassam Stadium, Ozone Leisure Complex and Minchery Farmhouse and 28b - Overflow carpark at Kassam Stadium site

Site no.	Site name	Summary	Response
028a	Kassam Stadium	Don't want a new football stadium in the north-refurbish the existing.	Planning permission is granted for a new stadium in Cherwell District, so the policy should respond to this and the potential for the stadium moving. Even if it does not move, there is some potential for intensification around the stadium.
028a	Kassam Stadium	There needs to be provision of leisure facilities proportional to the increasing number of houses. Building on the additional parking area for the Kassam Stadium site will just make it that much harder to get to; it's not acceptable that it's 800m away from the nearest bus stop, as that is far too far to walk.	The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected alongside the allocation of new homes. Site #028a (Kassam Stadium) has good bus connections to Oxford city centre. Site #028b (Overflow Car Park) is 600m from a bus stop to Littlemore (5A every 30 mins). It is just over 800m to Pegasus Road stop with buses every 5-6mins to the city centre.

Site no.	Site name	Summary	Response
028a, 028b, 028c	Kassam Stadium and Ozone Leisure Park	The promoter (who also owns the land) seeks permission for the following: Complete demolition of existing commercial (Class E)/ leisure (Sui Generis) buildings to allow for the phased redevelopment of the site. Redevelopment to include: 1) Construction of mixed use R&D laboratories (Class E(g)) with active ancillary uses (Class E(a),(b),(c),(d),(e),(f)); 2) Restoration of Grade II* Listed Minchery Priory public house (sui generis); 3) Construction of community leisure building (sui generis); 4) Construction of Cowley Branch Line mobility hub; 5) Construction of electrical substation; 6) Comprehensive hard and soft amenity and biodiversity landscape and public realm, and, 7) Other supporting or ancillary works and infrastructure including access and servicing.	Noted.

		Firoka supports the vision for Oxford 2042 that balances the provision of access to housing together	

Site no.	Site name	Summary	Response
		with nature, employment and social and leisure opportunities. To this end, we support the retained and refined allocation for the Firoka sites allowing for a mix of uses and confirm they are available and achievable. Firoka will be undertaking capacity studies ahead of the Regulation 19 stage of the Oxford Local Plan 2042, exploring densification potential appropriate to its potential future context of the reinstated Cowley Branch Line.	
028a, 028c	Kassam Stadium and Ozone Leisure Park	The policy SP14 was written before the proposed move by Oxford United Football Club to the Triangle at Kidlington. The move is very much at the planning stage and clearly there should be no consideration of any redevelopment of the Kassam Football stadium until the necessary planning permissions are in place and construction started as well as the required infrastructure such as foul water sewage and water supplies being ready. Policy SP14 needs updating to take this into account. As there is an existing playing field, this must be replaced before the site can be redeveloped.	The draft allocation policy does require reprovion of the sports provision before the stadium is developed for other uses.
Site no.	Site name	Summary	Response

028a, 028c	Kassam Stadium and Ozone Leisure Park	Littlemore Priory was approximately at the location of Minchery (Nuns') Farm policy must be updated to address this. Roman kilns have been found nearby Source_ RPS 1996 OHER 16787 Kiln site Sewage overflow due concerns to proximity to Oxford STW	Comments noted.

31 - Manor Place

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #31 Manor Place	Site assessment published for proposed allocation Manor Place does not appear to acknowledge proximity to a Grade I Registered Park and Garden.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

32 – Lincoln College Sports Ground

Site no.	Site name	Summary	Response

032	Lincoln College Sports Ground	Sports grounds are important to university culture and should be preserved. Already a very large student block nearby so concerned about adding to the high concentration.	The policy does require that sports provision is retained or re-provided.
032	Lincoln College Sports Ground	Lincoln College support proposed site allocations in the Plan drawn primarily from previously allocated sites in the Oxford Local Plan 2036 and sites that were being considered in the (now withdrawn) Oxford Local Plan 2040. It is, however, important to note that the sites owned by Lincoln and Jesus Colleges are separate and therefore it is vital that each College is able to deliver each site individually and separately.	The Jesus and Lincoln Sports Grounds are proposed as separate allocations in the draft site allocation policies.

33 - Littlemore Mental Health Centre, Sandford Road

Site no.	Site name	Summary	Response
033	Littlemore Mental Health Centre	We welcome the recognition of the site's development potential. The Trust has now undertaken initial planning feasibility work in this regard, based on the following objectives: - Maintain and enhance the existing operational functions, but explore the potential for 'transformational growth' including additional operational facilities such	Comments noted and reflected in the draft policy drafting.
Site no.	Site name	Summary	Response

		as additional inpatient capacity and accommodation for our expanding outpatient services; - Potentially provide facilities for other healthcare services ie primary care, community services, third sector etc; - Enhance existing areas of green space / biodiversity and their contribution to therapeutic treatments; - Provide better car parking management and improved accessibility. It would like these objectives to be recognised by the Plan.	

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #33 Littlemore Mental Health Centre	Consideration should be given to the relationship with nearby assets, including any impacts on the character and appearance of Littlemore Conservation Area	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

Oxfordshire County Council

Site no. and name	Summary of comment	Response	Outcome
033 – Littlemore Mental Health Centre	Landscape and Nature Recovery – Biodiversity This site is considered likely to have a significant negative impact on scrub by Heyford Hill Roundabout as well as Littlemore Railway Cutting SSSI and therefore likely contrary to policy G6.	Ecological impacts on all site allocations are assessed by the City Council inhouse ecologist. Where sites impact SSSIs or other ecological areas, mitigation measures within the policy wording will be proposed. We can consider how the allocation can seek to reduce the impact on scrub at a roundabout. Littlemore Railway Cutting is a Geological SSSI so unlikely to	Oxford City Action: Consider ecological impacts of development and where negative impacts are likely, propose suitable policy wording to mitigate.

Site no. and name	Summary of comment	Response	Outcome
		be impacted by development nearby.	

038a Thornhill Park (phase 2)

Site no.	Site name	Summary	Response
038a2	Thornhill Park	No need to include a site allocation policy – planning application already approved	While granting planning permission is generally considered a strong indication that development will go ahead, sites generally remain as allocations until development commences on site. As development has not yet commenced on <i>this</i> site, the site allocation will be retained in the plan.
038a2	Thornhill Park	Strongly disagree with the proposed development of phase 2.	Unclear if this refers to the grated planning permission, or if not, what aspect of the allocation.
038a2	Thornhill Park	The Shotover site provides a once-in-a-lifetime exceptional opportunity for Oxford and Oxfordshire to look forward and build upon its existing cluster of hospitals and life science	Noted. This is in reference to the adjacent site.

Site no.	Site name	Summary	Response

		research to curate a bespoke biomedical healthcare research and development cluster on one site and at the boundary with Oxford City. This would enable deliver of better health outcomes for society and improved skills and educational attainment for the local population. This would be derived from establishing a sustainable, low carbon, accessible, world class biomedical research campus on land at Shotover, grounded within an abundant green landscape and deliver biodiversity net gain. The exceptional circumstances that justify the site's release from the green belt is the ability of a biomedical healthcare and research and development cluster to improve health outcomes on a local and global scale. This is bespoke to the Shotover site, given its sustainable location and its prime geographical positioning, being excellently connected to existing hospital locations in Oxford and the University of Oxford's Old Road Campus. The ability to unlock and realise the plan objectives rests with the role that employment land in the right location plays as vital infrastructure. Thus, the identification of employment land in the right location is critical.	
Site no.	Site name	Summary	Response

038a2	Thornhill Park	Local resident – claims they were not consulted. Strongly disagrees that high rises would be in-keeping with the character of the neighbourhood. If the area needs to be developed, then 2-3 storeys would be acceptable. Expresses general disagreement with national policy for housebuilding.	All residents were posted leaflets about the consultation and advertisement of held events. Height and density policies in the plan address concerns about heights. National policy is out of the council's control.

42 - Nuffield Orthopaedic Centre (NOC)

Site no.	Site name	Summary	Response
042	Nuffield Orthopaedic Centre	Would support general residential development at this site. Not clear why employer-linked AH is supported (H6). Modifications requested: Policy needs to address the key issues linked to this site (summarised as follows): • Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs • Onsite Parking • Creating increased demand for housing	We will consider all of these issues when drafting any allocation policy for the site. Where necessary, site allocation can feature specific thematic issues that covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.
Site no.	Site name	Summary	Response

		Huge basements which remove water retention capacity of land Peat reserves are likely to be in the Lye Valley leading down from the NOC and Windmill Road/Old Road junction, these must be protected from being washed away.	
042	Nuffield Orthopaedic Centre	BBOWT - Any development on this site is of the utmost concern with respect to the Lye Valley. Any development on existing urbanised surfaces will still need a whole suite of measures to ensure there is no impact on the SSSI and LWS. It is on surfaces that are currently green and free draining that any development would have the most impact on the hydrology of the meadow through reducing the evening out effect that such green surfaces have on the amount of water flowing into the fen, which is particularly vulnerable to severe and permanent damage from short-term very high water flows. This matter is well dealt with in the detailed study in the evidence library on the Lye Valley and there is no need for us to expand on it here. Development on green surfaces also may well lead to less water flow during dry periods causing the fen to dry out, and impacts on water quality which also can have a highly negative impact on the fen. In our opinion therefore no development on currently green surfaces should take place on this site.	The site allocation policy in the draft Regulation 19 plan identifies that the site falls within the impact risk zone for the Lye Valley SSSI. Any proposals for development on the site would need to demonstrate that there would be no impact upon the Lye Valley SSSI.

43 - Old Road Campus

Site no.	Site name	Summary	Response
043	Old Road Campus	Local Plan must include a site allocation policy for this site. Given the site's proximity to the Churchill Hospital Site (SHLAA Ref: 012), the issues affecting the site will be the same and can be summarised as follows: • Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs • Onsite Parking • Creating increased demand for housing Huge basements which remove water retention capacity of land	This site is no longer being taken forward as a site allocation. There are no vacant plots and any future redevelopment proposals at the site can be assessed against the wider suite of policies in the plan.

043	Old Road Campus	BBOWT - Any development on this site is of the utmost concern with respect to the Lye Valley. Any development on existing urbanised surfaces will still need a whole suite of measures to ensure there is no impact on the SSSI and LWS. It is on surfaces that are currently green and free draining that any development would have the most impact on the hydrology of the meadow through reducing the evening out effect that such green surfaces have on the amount of water flowing into the fen, which is particularly vulnerable to severe and permanent damage from short-term very high water	This site is no longer being taken forward as a site allocation. There are no vacant plots and any future redevelopment proposals at the site can be assessed against the wider suite of policies in the plan.
Site no.	Site name	Summary	Response
		flows. This matter is well dealt with in the detailed study in the evidence library on the Lye Valley and there is no need for us to expand on it here. Development on green surfaces also may well lead to less water flow during dry periods causing the fen to dry out, and impacts on water quality which also can have a highly negative impact on the fen. In our opinion therefore no development on currently green surfaces should take place on this site.	

Oxfordshire County Council

Site no. and name	Summary of comment	Response	Outcome

043 – Old Road Campus	<u>Landscape and Nature Recovery – Biodiversity</u> This site is considered likely to have a negative impact on Boundary Brook OxCityWS and therefore contrary to policy G6.	We will consider how to reflect this in the allocation policy.	Oxford City Action: Consider ecological impacts of development and where negative impacts are likely, propose
Site no. and name	Summary of comment	Response	Outcome
			suitable policy wording to mitigate.

49 - Oxford University Press Sports Ground, Jordan Hill

Site no.	Site name	Summary	Response

049	OUP Sports Ground	Do not allocate due to lack of green space and proximity to the river. Sports pitches are used by the community.	The draft policy requires reprovision of pitches, which is most likely to be by significant retention on site.
049	OUP Sports Ground	BBOWT disagree with the site allocation as it is in the Oxford Green Infrastructure Network. Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	It is agreed that the green space does have important functions, but it is not agreed that these justify full protection of the site because there is a reasonable prospect a solution can be found to ensure reprovision of the green infrastructure functions of the site, which may well be reprovision within the site itself, with enhancements of quality.

54 - Ruskin College Campus

Site no.	Site name	Summary	Response
054	Ruskin College Campus	The site should remain restricted to college-only uses. The Old Headington Roads are already overloaded and could not cope with other types of development. More on-site residential accommodation for the college reduces pressure elsewhere.	The site is expected to remain as a college campus, with student accommodation and the allocation policy in the draft Regulation 19 plan reflects that.

054	Ruskin College Campus	BBOWT object to site allocation.	Noted

61 - Union Street Car Park and 159–161 Cowley Road (formerly Union Street Car Park)

Site no.	Site name	Summary	Response
061	Union Street Car Park	We are concerned about the loss of the car park as it is an important amenity for local businesses and its loss would put further pressure for parking on streets leading off Cowley	It will be a requirement in the policy that any development retains car parking on site at a sufficient level – as determined by relevant officers

Site no.	Site name	Summary	Response
		Road, including obstructive pavement parking. However, in its favour, it is clearly brownfield land.	in the City Council - to support the district centre.
061	Union Street Car Park	This provides an important open space between developments. Building on it would create a more claustrophobic area. The existing buildings should be redeveloped instead.	Surface level parking is not an efficient use of land. General policies in the plan ensure high quality design that is not overbearing to its neighbours.

061	Union St Car Park	<i>(refers to LP2040 Policy)</i> There aren't any trees on the southern boundary. Policy is ineffective and is unjustified. There is no data to support the allocation. The reduction of car parking seems difficult to achieve without a severe economic impact on the Cowley Road District Centre. Car park is often at or near capacity. The allocation of this site would therefore be contrary to Policy C2, Maintaining Vibrant Centres. There is no rationale given for the allocation of this site. Modification requested:	The site is being considered for inclusion in the plan as an allocation because of developer interest in delivering residential units, and the sustainable location in the district centre. It will be a requirement in the policy that any development retains car parking on site at a sufficient level – as determined by relevant officers in the City Council - to support the district centre.
Site no.	Site name	Summary	Response
		A study should be undertaken to determine best use of site before the site is allocated/ prior to new policy being developed.	

62 - University of Oxford Science Area & Keble Road Triangle No

comments.

63 - Warneford Hospital

Site no.	Site name	Summary	Response
063	Warneford Hospital	Site allocation policy must be drafted in a way that addresses the following key issues: • Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs • Onsite Parking • Creating increased demand for housing • Huge basements which remove water retention capacity of land	Site allocations can feature specific thematic issues that covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.
Site no.	Site name	Summary	Response
063	Warneford Hospital		Comment noted.

		Warneford Hospital is currently allocated within the Oxford Local Plan 2036 as Policy SP22. The Trust submitted a hybrid planning application for the development at Warneford Park in July 2025, and the planning application has been submitted in accordance with the adopted policy. The Trust continue to support the allocation of Warneford Hospital as it is expressed in the current Local Plan and request that it is carried through into the 2042 Regulation 19 Local Plan. We agreed a Statement of Common Ground with you in March 2024 substantially to that effect. The Trust look forward to engaging further with OCC at the next stage of the Local Plan consultation.	
063	Warneford Hospital	Object if parking for cars is not strongly restricted in line with other transport and environmental policies.	Development of all sites must be in line with the general policies of the plan.
063	Warneford Hospital	This site contains a playing field that may be needed for the community.	The playing field has never been used by the community, and would not be expected to be suitable for general community use, being in a residential mental health hospital.

65 - West Wellington Square

Site no.	Site name	Summary	Response
065	West Wellington Square	This site was not included in the site assessment.	A Sustainability Appraisal and Site Capacity Assessment have been carried out for this site.

70 - Island Site (Park End Street/Hythe Bridge Street) No

comments.

75a, 75b - Oxford Railway Station and Becket Street Car Park

Site no.	Site name	Summary	Response

075 (a and b)	Oxford Railway Station and Becket Street Car Park	Whilst we understand that the site allocation policies are being developed ready for the next stage of consultation, we note that the OLP2042 proposed site allocations map includes the 2.56 acre 'Oxford Railway Station and Becket Street Car Park' site (Ref: 075a/075b). The map identifies the site as being 'Suitable for a mix of uses, including retail, residential, community and commercial uses'. Network Rail welcome the proposed mix of acceptable uses but would advocate for hotel, education and student accommodation uses to be added to the list of	Given the site's location within the city centre, a range of uses are appropriate, including hotel, and student accommodation uses. The plan contains specific policies supporting both uses within the city centre. The site allocation policies should be read alongside the rest of the plan. The Western Entrance area at
Site no.	Site name	Summary	Response
		permissible uses during the next round of planmaking. Network Rail would also support the inclusion of the proposed Western Entrance area at Oxford Railway Station to be included within the boundary of any future Site Allocation.	Oxford Railway Station is currently under construction. As planning permission has been granted for the current scheme (which is not yet complete) rather than include the Western Entrance area within a site allocation, we will look to make a small alteration to the city centre boundary to include the Western Entrance area within it. We will also look to make a corresponding amendment to the West End Area of Focus boundary to include the Western Entrance area within it.

075 (a and b)	Oxford Railway Station and Becket Street Car Park	Oxford must have a combined bus and coach station, and it would ideally located here.	Masterplanning work on the station will look at optimising opportunities for seamless interchange.

76 – Oxpens

No comments.

81 - Worcester Street Car Park

Site no.	Site name	Summary	Response
81	Worcester Street Car Park	Canal basin should be recreated, perhaps with a small amount of residential accommodation.	There is no longer an operational need for the canal basin in this location.
81	Worcester Street Car Park (Nuffield sites)	This should not be housing, but a hotel or public building around a restored canal basin.	A mix of uses is across the three Nuffield sites in the West End (which are one site allocation policy), including housing.

104 - Former Iffley Mead Playing Field

Site no.	Site name	Summary	Response
104	Former Iffley Mead Playing Field	Do not allocate. Site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford). Also, site is in close proximity to SSSI. Heritage and amenity must be preserved.	The site is private and not in public use. The site allocation policy acknowledges the site's proximity to the Iffley Meadow's SSSI and the Iffley Conservation Area. It also identifies that there is archaeological potential on the site

Site no.	Site name	Summary	Response
			and potential for the site to impact views from the Rose Hill View Cone. Development of the site would include a requirement for the provision of public open space.
104	Former Iffley Mead Playing Field	Agree because it's a brownfield site and outside the conservation area, but this and Court Place Gardens is bringing significant numbers of new homes to a small area that couldn't then support any more (e.g. Land at Meadow Lane- which should not be developed).	Comments noted.

104	Former Iffley Mead Playing Field	This is an existing playing field.	The site is a disused playing field. At Examination of the Oxford Local Plan 2036, the Inspector concluded that the site was surplus to requirements as it had only even been attached to the school, which had moved and not used it for many years.
104	Former Iffley Mead Playing Field	Much previous opposition to LP 2042 development advocated re-allocating the homes designated for the Oxford CC-owned LP 2042 to Oxfordshire CC-owned field Iffley Mead, just outside the Conservation Area. This 2 Ha site is designated in the <i>OCC Local Plan to 2036</i> for 90 homes at an even higher density, and with much more problematic	Policy SP38 of the adopted Local Plan 2036 seeks a minimum of 84 homes for this site. The site allocation policy in the Local Plan 2045 also seeks a minimum of 84 homes. There are no proposals to
Site no.	Site name	Summary	Response
		vehicle access, than LP 2042, so increasing the number of homes on Iffley Mead by 36% would be both administratively impractical and permanently impair amenity for both its new residents and those of adjoining streets, including the recently enlarged Iffley Academy Special School. Displacing a 'problem' onto a neighbourhood less able or willing to protest effectively cannot be conducive to social cohesion.	reallocate any homes from elsewhere onto this site.

111 - Oxford Stadium (former Greyhound Stadium)

Site no.	Site name	Summary	Response
111	Oxford Stadium	Strongly support the inclusion of the stadium for a comprehensive redevelopment.	Because the site is currently in use for uses important for the community, and redevelopment could not feasibly take place alongside this, the site is not taken forward in the draft Regulation 19 Plan.

113 - Redbridge Paddock (land east of Redbridge Park and Ride)

Site no.	Site name	Summary	Response
113	Redbridge Paddock	Do not allocate. Site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford). Heritage and amenity must be preserved.	General policies of the plan guide all of these topics. Development of the site would include a requirement for provision of public open space, biodiversity considerations such as the Local Nature Recovery Strategy, as well as heritage.
113	Redbridge Paddock	Support for allocation.	Noted.

113	Redbridge Paddock	Development on the site is a good idea, but the river frontage should be kept open and buildings should not be too tall.	General policies of the plan guide design decisions about building heights. the site allocation policy also includes a requirement for a green buffer along the river bank.
113	Redbridge Paddock	The site was a special place to visit- where have the horses gone?	The site does not officially have public access, although it can be viewed from the surrounding roads. Uses for grazing horses is a matter beyond the local plan.
113	Redbridge Paddock	The site is important for biodiversity and as a wildlife corridor and the green space should be protected.	The requirement for biodiversity net gain means that there should not be a loss of biodiversity overall. The general policies of the draft plan and

Site no.	Site name	Summary	Response
			the site allocation policy require high quality green features to be designed into the development.

113	Redbridge Paddock	BBOWT – strongly object to site allocation. BBOWT have commented on this site before. It forms part of the Oxford Green Infrastructure Network. Whilst the proposed allocation site is not subject to a nature conservation designation it has considerable conservation interest (e.g. orchids, otter, kingfisher). It is also located adjacent to the nationally designated Iffley Meadows SSSI, which BBOWT manages. The SSSI is a fragile site comprising lowland grassland, which suffers under increased pressure from visitors. This site allocation raises concerns with regard to indirect impacts on the SSSI by affecting hydrological flows, increased disturbance, and nutrient enrichment etc. BBOWT use grazing animals to manage the SSSI, which is essential to maintain this important habitat, however, there is a real risk that increased disturbance and indirect recreational pressure might make the management of this site untenable over time, resulting in the decline of the site. We oppose this allocation as it does not adequately protect the SSSI.	The local plan evidence base includes reviewing Green Infrastructure network and protected sites, including SSSI. The SSSI is separated from the site by a watercourse, which reduces the potential for direct and indirect impacts, including visitor pressure. The SSSI site is not directly or easily accessed from the development site. Nonetheless the site allocation does highlight that the site is within the identified impact risk zone for the SSSI and any proposals must demonstrate no adverse impacts, including considering surface water and groundwater flows. The latest GI assessment identifies the site as Supporting GI, so
Site no.	Site name	Summary	Response
			enhancement will be required to mitigate any losses.

117 - Land surrounding St Clement's Church

Site no.	Site name	Summary	Response
117	Land surrounding St Clement's Church	This should deliver strong public benefit in terms of increased access and retaining elements of the existing rural character.	Agreed, and the draft site allocation policy attempts to ensure these things.
117	Land surrounding St Clement's Church	At present, I look out from the back of my house directly on to the church. Concerns include invasion of privacy for my home as well as disruption to diverse wildlife currently dwelling on that land behind the church and leading down to the river such as voles, badgers, bats, foxes. It is also part of the floodplain that reaches over Angel and Greyhound Meadow. Any construction will have a detrimental effect on this, including the drainage infrastructure. The church will become virtually an island in the middle of a housing estate if these plans go ahead. This is one of the few remaining ancient parts and protected sites of Oxford. My haven of a garden would, like the church, be swallowed up in a housing estate.	Policies of the plan aim to ensure sufficient privacy of new and existing occupiers, and the site allocation policy acknowledges the closeness of existing dwellings to the site in this location. The site allocation policy is clear that there are potential wildlife impacts that would need to be investigated, relatively low densities are likely to be necessary, and green areas will need to be retained and enhanced
Site no.	Site name	Summary	Response
			on the site, including between the church and the river.
117			

	Land surrounding St Clement's Church	No mention is made of foxes, deer and squirrels that visit the site. Nuthatch, magpies, green and greater spotted woodpeckers, great, blue and long tailed tits also visit the site. Therefore, the biodiversity should be improved, rather than habitats destroyed. Marston Road floods when it rains.	These are not protected species and will be able to find habitats all along the river corridor. Full biodiversity surveys will be required as part of any detailed planning application.

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #117 Land at St Clements	Site assessment for proposed allocation St. Clement's Church does not appear to acknowledge proximity to a Grade I Registered Park and Garden.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

120 – Unipart

Site no.	Site name	Summary	Response

120	Unipart	The policy SP 8 reserving this site solely for employment use was written in 2016 and since then nothing has changed in any meaningful way - most of the site is either used for vehicle parking or open-air storage. It has been like that since the Pressed Steel Plant closed 40 years ago. It represents a failure to redevelop what is effectively a Brownfield site and a large one. The Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.	The land owner has stated a clear intent to develop the site during the plan period.

124 - Slade House

Site no.	Site name	Summary	Response
124	Slade House	It is envisaged that the Trust will continue to provide statutory healthcare services from this site subject to the outcome of our estates strategy review referenced above. In turn, the Trust also welcomes the housing allocation; however, it may also seek to develop an element of private residential accommodation in addition to the employer-linked affordable component. It would also not wish to exclude other complementary uses on the site including improved health	Comments noted and reflected in the wording of the draft site allocation policy.

Site no.	Site name	Summary	Response
		care facilities, associated administrative functions and extra care or student accommodation.	

124	Slade House	This site has too much surface level parking on-site. It includes an important green space that should be preserved. Policy needs to address the key issues linked to this site (summarised as follows): • Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs • Onsite Parking • Creating increased demand for housing • Huge basements which remove water retention capacity of land. A footpath used to run from Horspath Driftway to the current ring-road and is still present for much of its length, although it seems householders have blocked this off, this should be reopened. <i>(refers to LP2040 Policy)</i>	Site allocations can feature specific thematic issues that covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.
Site no.	Site name	Summary	Response

		No statement regarding how extra staff will be managed. Greenfield runoff rates must be achieved. Green spaces must be marked on Policy Map and preserved.	

144e Marston Paddock extension

Site no.	Site name	Summary	Response
144e	Marston Paddock extension Green Belt assessment	The full 2023 Green Belt assessment has not been made available for comment under the Evidence Base and Supporting Documents section of the consultation website or anywhere else on the Council's website. It has therefore not been possible to review the full 2023 assessment against the new requirements of the December 2024 NPPF (with reference to site 114e).	An updated Green Belt assessment, with methodology reflecting the NPPF, was published at Regulation 18, alongside the 2015 and 2017 assessment.

173 - Bayards Hill Primary School Part Playing Fields

Site no.	Site name	Summary	Response
173	Bayards Hill Primary	Do not allocate this site as Barton:	This site is no longer being taken forward.
Site no.	Site name	Summary	Response

	School Part Playing Fields	- Is the most green-space-deprived suburb in Oxford, Barton Park even worse - Will be surrounded by Land North of Bayswater Brook development (1500 houses) • - Will lose green space and add residents via the Sandhills Field Development (150 houses) Inclusion of this policy would be ineffective as - this site is too close to the A40 for health • There is nowhere to provide re-provision of this green space in Oxford	

204 - East Oxford Bowls Club and 665 Oriel College Sports Ground and adjoining land (comprising of 263 and 639)

Site no.	Site name	Summary	Response
204	Former East Oxford Bowls Club	As a sports facility, this should be protected from development.	This is a small site previously used as a bowling green but it has been out of use for many years.
204	Former East Oxford Bowls Club	DRARA would like to see this run down empty site restored to beneficial use, but not necessarily for	The site is undoubtedly sensitive in terms of the potential impact

Site no.	Site name	Summary	Response

		housing. The site is not identified as green infrastructure but perhaps it should be. The site is in the ownership of Oriel College and in recent years has become run down and affected by scrub regeneration, fly-tipping and anti-social behaviour. Despite these factors it still makes a positive contribution to the Bartlemas Conservation Area by helping to maintain the rural character and seclusion of the Area, acting as a green buffer along its Cowley Road edge, effectively marking the limit of Victorian Oxford. If intensively developed these benefits to the Conservation Area would be lost. In addition we note that the site is covered by policy HD9 View Cones so it is sensitive to any tall development. In our view a relatively low key community use for this site would be best – perhaps returning the site to use as community sports facilities, a community garden or play area, or even an extension to the very popular allotment site next door. If it is to be allocated for development, high density development in our view would be inappropriate. A use such as low rise specialist accommodation for the elderly with a generous amount of green space might possibly be accommodated, given very sensitive design.	of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets, and should respond carefully to that.
Site no.	Site name	Summary	Response

		Any change of use or development should retain the strong hedgerow cover next to Cowley Road so that the sense of a green oasis survives. The tests set out in Policy HD1 need to be applied very carefully to protect and enhance the character of the Conservation Area, including the quiet rural, hedged character of Bartlemas Lane, views to and from the historic hamlet and its Listed Buildings, dark skies, and the privacy and visual amenity of the neighbouring allotment site.	
204 and 655	Oriel College Sports Ground, Bartlemas and former Bowling Green	Great care needs to be taken with regard to the proposed development of these sites and the potential impacts on the setting of the Bartlemas Conservation Area. Should the adjoining sports grounds be allocated for development, detailing guidance should be provided within any relevant policies to ensure that the unique historic character of the Conservation Area is unharmed and unaffected. It should also be made clear that no intensification of traffic along Bartlemas Lane would be acceptable due to the proximity of sensitive historic buildings. A buffer should be left to the Bartlemas access lane to avoid affecting its character.	The site is undoubtedly sensitive in terms of the potential impact of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets, and should respond carefully to that.

Historic England

Site no. and name	Summary of comment	Response	Outcome

Site #665 inc #663 and #204 Oriel College Sports Ground, Bartlemas and former Bowling Green	Needs very careful consideration, including heritage impact assessment (HIA). Careful consideration is needed of the potential impacts of all associated development, including access to the site.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

289 - Sandy Lane Recreation Ground

Site no.	Site name	Summary	Response
289	Sandy Lane Recreation Ground	Objection: Do not progress this site as next to Cowley and East Oxford (areas of the city with the lowest amount of green space per inhabitant in the city). This land is needed for an increasing population (in the city) and any replacement sport facilities from Cowley/Littlemore.	Reprovision of sports facilities would be required.
289	Sandy Lane Recreation Ground	The Sandy Lane campaign objects to the inclusion of any recreation grounds on the local plan without paying proper heed to the requirements of the NPPF. The campaign will challenge the inclusion of Sandy Lane Recreation Ground as a development site when this plan goes to inspection.	Reprovision of sports facilities would be required, in accordance with the NPPF.
Site no.	Site name	Summary	Response

289	Sandy Lane Recreation Ground	BBOWT disagree with the site allocation as it is in the Oxford Green Infrastructure Network. Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	It is agreed that the green space does have important functions, but it is not agreed that these justify full protection of the site because there is a reasonable prospect a solution can be found to ensure re-provision of the green infrastructure functions of the site.

389 - Land at Meadow Lane

Site no.	Site name	Summary	Response
389	Land at Meadow Lane - Weight of objections	The weight of opposition from public and other stakeholders means the site should not be allocated. There are objections from: Environment Agency Oxford Preservation Trust BBOWT Cyclox	What needs to be considered for the local plan is whether there is potential for a scheme to come forward that is acceptable in the context of national policy and of the Plan's proposed strategy and detailed policies. Moreover, what is relevant with objections is not the sheer number of objections, but whether a material issue is raised that informs the detailed drafting of

Site no.	Site name	Summary	Response
		As well as from over 1,000 respondees in the OxPlace January 2023 consultation and 50 comments to the OLP2042 Early Engagement Survey/ These responses highlight cross-cutting themes and many and varied reasons the site should not be developed. The community should be listened to and to override them would be an abuse of power, especially as the council has asked the public for input and has said they will listen to them. Suitable and compatible uses, such as a 'Meadow School' for outdoor education should then be discussed with local schools and communities	the policy or that shows this is not possible. The objections to the planning application relate to that application. The application is not yet determined, but even if it is turned down as not suitable, that does not necessarily mean that there is not potential for a suitable scheme to come forward.
389	Land at Meadow Lane - Heritage	Harm to the Iffley Conservation area. The sites lie within the Iffley Conservation area. Because of this the National Planning Policy Framework confirms that it is a heritage asset and places a large number of obligations on Local Planning Authorities. Policy HD1 Conservation Areas states that 'substantial harm to a conservation area should be wholly exceptional.' This is not addressed. Also, this ancient meadow, fully within the Iffley Conservation Area is bordered by an ancient drover's route. There are Two Grade II Listed Buildings (Tudor Cottage and Townsend Close) and a Grade II Listed Wall (Wall and Gate of Townsend Close) nearby. Road improvements and urbanization along Meadow Lane and Church Way will affect	The site is undoubtedly sensitive in terms of the potential impact of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets, and should respond carefully to that. The policy is clear on this requirement. Many sites in Oxford have archaeological potential. That does not preclude development, but

Site no.	Site name	Summary	Response
		the setting of these heritage assets. Not addressed by the Council. There is archaeological potential The site is within the view cone There are unevidenced changes in the description of Iffley Village, whereas the 2009 Conservation Area Appraisal was subject to thorough consultation	policies do require care, similarly to the View Cone.
389	Land at Meadow Lane - biodiversity	It is unsuitable according to the assessments of OCC and OxPlace themselves in respect of damage to current high biodiversity. It should be designated as an OCWS adhering to the Council's own biodiversity assessment. Local Nature Recovery Strategy (LNRS highlights this site for nature recovery) There are badgers present on the site.	The identification of a site as having potential for nature recovery does not preclude the site from development. General policies of the Local Plan do require that the mitigation hierarchy is followed, and Biodiversity Net Gain is also required.
389	Land at	Damage identified in the Flooding Risk Assessment.	

	Meadow Lane - flood risk	Conflicts with national policy by not applying the sequential test (to compare with other potential sites with lower flood risk). NPPF (para 172) and the PPG. Disturbance to the drainage of the site and the risk of problems as a result of building on the edge of the floodplain.	The FRA referred to relates specifically to the proposed development in the planning application. A Level 2 SFRA has been carried out to support allocation of the site in the Local Plan. That assesses whether it is likely a development that passes the

Site no.	Site name	Summary	Response
			exceptions test could come forward. The Level 2 SFRA did not suggest this wasn't possible. The flood risk sequential test will be published alongside the Local Plan for the Regulation 19 consultation.
389	Land at Meadow Lane - sewage	Problems of ensuring adequate sewage disposal. The Environment Agency has had to put a stay on all Oxford development because of the failures of its sewage disposal routes. This is still not rectified. Piling more pressure onto it will make it worse.	Adequate sewage disposal is important, but there is no reason to think this is not achievable on this site. Thames Water have adequate proposals for the upgrade to the sewage treatment works and there is not a blanket restriction on development.
389	Land at		

	Meadow land -access and transport	It will harm the Principal Quiet Route for Active Travel. The site will add substantial traffic onto a designated Quiet Route that is much used for journeys to and from Oxford. This is crazy and unsafe. Parking is frequent flashpoint for confrontation and competition between established and new residents for street parking, now regulated by the recently imposed CPZ, which may lead to disputes. LP 2042 development must include sufficient parking for all its residents. It's a pity the planners succumbed to pressure to delete from the 2021 scheme the pairs of purpose-built parking places on the SW side of Meadow Lane.	The change in the details of the planning application in relation to parking spaces relate to the details of the proposals, and not the inprincipal suitability of the site for parking. It is considered that the site can be accessed safely within minimal negative transport requirements. Meadow Lane is identified as an onroad quiet route in the LCWIP, but so are many other routes in Oxford that have significantly more

Site no.	Site name	Summary	Response
		hazard along the Meadow Lane site will be caused by severely increased two-way traffic. This will urbanise the route and harm the Conservation Area	development alongside than Meadow Lane, even if development takes place on this site.
389		SA	

	Land at Meadow Lane-SA	The grading system used to indicate positive, negative or neutral impact, has been manipulated and upgraded when addressing many aspects of the proposed development – to less negative, more positive or neutral. Size: The total size is incorrectly shown as 0.99ha when it should be 1.5ha; Use: it has not been a ‘pony paddock’ for many years Objective 1 - Building on this greenfield site WOULD have high carbon costs, both from actual building work and from loss of carbon storage in the earth of this hitherto uncultivated meadow. Objective 2 - Regarding flood zones, the SA OMITS information from the LP2036 which states that 7% of the site is in Flood Zone 3b with additional land within FZ2. The flood testing has not been carried out correctly, by not applying the sequential test as required by government policy. Objective 3 - Reference to the site as ‘unprotected open space’ omits the fact that is it UNDEVELOPED open space. Further, this greenfield site has great biodiversity value and qualifies as an Oxford City Wildlife Site. No explanation as to why it is graded orange or what efforts to avoid its use has been made. Should be red.	The SA Framework (“grading system”), was developed in consultation with Natural England, the Environment Agency and Historic England. It provides a standardised approach for assessing the development potential for all sites. Each site has been considered in relation to the each of the SA Objectives and scored according to the SA Framework, taking into account additional information, where appropriate. Size: the correct site size is 0.99ha and this will be corrected on the SA form for the Regulation 19 consultation. Objective 1 The assessment is applied in the standard way. Objective 2 The flood zone information uses the most recent (2025) mapping from the

Site no.	Site name	Summary	Response

		Objective 4 – Numbers: not a material number. AH: There is no definition of ‘affordable’ housing; nor evidence given as to why this site is ‘likely’ to be policy compliant. Doubt it will be affordable housing. Objective 7 Public Open Space, the site is NOT in private ownership!! The Council bought it with taxpayers’ money. It is public land. PUBLIC SPACE: The site is owned by the City Council and therefore not in private ownership as they state. It is not used for animal grazing. Such references indicate no renewed assessment but reliance on the outdated and flawed LP2036 assessment. The community access the land for scything to manage biodiversity as the Council have failed to mow the meadow despite their obligation as landowner to do so. Objective 8 No mention of the key Quiet Route of Meadow Lane which is well used every day for Active Travel. Under Objective 8, there are several errors. The bus stop, railway station, post office and schools are all further than is stated. Bust stop should not be green. The services are only 3, 3A, ST1. That is misleading. Under ‘Post Office’ it contains repeated information about the GP surgery. Objective 9 – Water. Incorrect information given. There IS a watercourse adjoining the site, which flows into the Thames and will be impacted by sewage and wastewater discharges.	Environment Agency. The flood risk sequential test is not part of the SA process, but a key part of planmaking has been carried out to inform the next stage of the plan. Objective 3 The orange grading aligns with the scoring system. The site is not a designated Oxford City Wildlife Site. The SA simply reports this. Objective 4 There is nothing to suggest the site could not or would not deliver the standard required amount of affordable housing. Objective 7 There is no public access to the site, so it is private and not public open space. The site was last used as a horse paddock, but the description will be updated. Objective 8: These measurements on the form have been reviewed and updated for the next stage of consultation.

Site no.	Site name	Summary	Response

		Objective 10 The site is rich in biodiversity and would be hugely negatively impacted by development. It lies along three of Oxford's wildlife corridors (see Oxford City Green Infrastructure Study). It is also notable that the Council's regular Biodiversity Net Gain offsite partner has withdrawn support re this site, because of the biodiversity value cited by several Statutory Consultee wildlife organisations. Objective 11 – It is in the Iffley Conservation Area and should never have been allocated: Policy HD1 Conservation Areas states that “substantial harm ... to a conservation area should be wholly exceptional..” Regarding the designation of a ‘Historic Core Area.’ The Council states “Not within a historic core area.” Which contradicts what they say under archaeology, where the site is (correctly) stated to be “located within the historic core of the medieval Village. There ARE listed building implications, especially for the wall and gate of Grade II listed Townsend Close. Road improvements and urbanisation along Meadow Lane and Church Way will affect the setting of these assets. Objective 12- diversifying the economy and employment opportunities. Fails to identify the importance of Iffley as contributing to culture/leisure/visitor sector (e.g. circular walk on Quiet Route). Should be orange. Access constraints. Council assessment says access via Church Way. Development proposals give the main access off Meadow Lane. Says surrounding uses are residential but to the west they are not.	Objective 9: This has been reviewed and updated for the next stage of consultation. Objective 10: The SA scoring undertaken at Reg. 18 has regard to the findings of the ecological assessments (undertaken to support planning application), while reflecting the position that no formal ecological designations are present. Given the ecological considerations present at the site, a suite of mitigation measures are proposed for the site. Objective 11: Location within a conservation area does not mean that development cannot happen. A conservation area is not an area where no new development can occur such that it remains exactly as it was when it was designated. Each conservation area has special characteristics that should not be harmed and that proposals should be informed by and respond to to preserve that special character. It is considered that development on this site can achieve that. The Historic

Site no.	Site name	Summary	Response
		The Stage 2 Conclusion is erroneous: for example, badgers and invertebrates cannot simply be dealt with 'in the policy and at the application stage'. That sounds as if it is possible to make this totally unsuitable site suitable simply by careful policy wording. It is not a robust or evidence-led approach to carry forward an allocation simply because it was allocated in LP2036.	Core Area is a specifically designated area of the city, which is where the 'dreaming spires' are found and which has a policy applying specifically to that area. Objective 12: There is no reason that potential development of the site would have a negative impact on the economy or employment. It is considered that the site can be suitable with careful proposals that respond to the sensitivities of the site.
389	Land at Meadow Lane	Support for site allocation – site is suitable for affordable housing; the development of the site would benefit the village and conservation area creating greater social and economic diversity. Do not believe site should be designated an Urban Wildlife site or Local Green Space - there are many other sites locally that provide for this.	Support noted.
389	Land at Meadow Lane	Protests land being used for a small amount of residential housing but would support a school at Meadow Lane.	Noted

Site no.	Site name	Summary	Response
389	Land at Meadow Lane	Support (in the context of preference of this site over Iffley Mead) I regret the loss of farmland to urban development as much as anyone but understand that housing is urgently required and this site, with easy access to transport and employment, has much to offer. The Land at Meadow Lane LP 2042 has been closed to the public and leased for horse or sheep grazing for many decades and is mostly concealed behind hedges, so is inconspicuous to passers-by. At under 1 Ha, it represents only a tiny fraction of the large area of minimally cultivated land	Comments noted.

428 - Rectory Centre

Site no.	Site name	Summary	Response
428	Rectory Centre	We welcome the intention to allocate the site for residential purposes, and we consider it is suitable for at least 21 dwellings. We do not consider redevelopment of the site should be restricted to the existing building height, and that there is scope to	Support noted.

Site no.	Site name	Summary	Response
		increase height to match surrounding building heights along the Cowley Road. However, we recognise that the proposed height should respect the View Cone from Crescent Road. Health uses currently on the site would be provided, as necessary, elsewhere on other Trust sites in Oxford.	
438	Former Blanchford's Building Merchants	Surprised that the former Blanchford's building supplies depot in Headington is not listed. It should be investigated. It seems a prime site for development.	The site is included within the Strategic Housing Land Availability Assessment (SHLAA), which forms part of the evidence base for the Local Plan.

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #428 Rectory Centre	Highlight the importance of ensuring any policy for this site's redevelopment embeds a realistic expectation of what would be delivered without significantly increasing the building height. Site falls directly within a view cone.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

438 Former Blanchford's Building Merchants

Site no.	Site name	Summary	Response
438	Former Blanchford's Building Merchants	Surprised that the former Blanchford's building supplies depot in Headington is not listed. It should be investigated. It seems a prime site for development.	The site is included within the Strategic Housing Land Availability Assessment (SHLAA), which forms part of the evidence base for the Local Plan.

439 - Marston Road Campus No

comments.

440 - 1 Pullens Lane

Site no.	Site name	Summary	Response
440	Pullens Lane	Headington Hill has calcareous springs or surface water as map per below, showing TUFA, Fen and probable peat reserves in and around Headington Hill Park. Modification requested:	More detailed capacity assessment work can't give enough certainty that the site may have a capacity more than 10, so no site allocation policy has been included in the draft plan.
Site no.	Site name	Summary	Response

		Site allocation policies should include a requirement to undertake hydrological and fen survey, and recovery where possible. The intensification of development directly contradicts Headington Hill Conservation Area Appraisal which refers to, in Part 3, Pullen's Lane to loss of residential character, and tranquillity. There is simply no point having a Conservation Area if this sort of development is permitted.	

463 - Ruskin Field

Site no.	Site name	Summary	Response
463	Ruskin Fields	The Site extends to c. 3.62ha and is entirely owned by Ruskin College (University of West London) with Welbeck Land in place as strategic land promoter and master developer (the Promoter). The Site has been identified as surplus to requirements by Ruskin College with disposal linked to generating capital for upgrading the college's facilities. The Site has been the subject of a comprehensive technical evidence base and consultation with OCC officers, which	Noted.

Site no.	Site name	Summary	Response
		has demonstrated there are no overriding constraints to the development of c. 130 homes with associated public open space, landscaping, infrastructure and access from Foxwell Drive. The Promoter can therefore confirm that Ruskin Fields is available, deliverable, and capable of providing c. 130 homes in the first five years of the new local plan period. The Site and proposals for residential development align with the Regulation 18 Local Plan Objectives and would support Oxford in the delivery of much needed homes in the first five years of the local plan. The Promoter intends to engage comprehensively with OCC and wider stakeholders as the Local Plan progresses to ensure opportunities for the Site are achieved alongside sensitive design and mitigation.	
463	Ruskin Fields	It is a supporting green space and has particular importance as part of the continuous green corridor from Dunstan Park in the west to Barton Triangle in the east. Loss of a green corridor can't easily be mitigated. The likelihood of peat deposits is extremely high. In addition, there are heritage impacts the green fields in this location provide the rural setting of the village.	The Regulation 19 plan puts forward the northern part of the fields only, leaving the southern part, where there is a pond, to remain as a wildlife corridor from west to east. The landowner has said the site is available and did not note legal

Site no.	Site name	Summary	Response
		If they are taken forward despite our concerns then we consider that a minimum of 50% of the land must be retained as green space (in addition to gardens within the urban development) including a variety of habitats including trees, and wetlands, which will benefit both wildlife and people. Land Registry title ON269207 records covenants restricting building on the fields.	issues. It is their responsibility to ensure there are no legal issues.
463	Ruskin Fields	The site (463) is incorrectly defined, as the southernmost field is already allocated under SP56 of Local Plan 2036.	Local Plan 2045 will supersede Local Plan 2036.
463	Ruskin Fields – harms do not outweigh benefits and site previously dismissed	Site is undeliverable and unjustified (its allocation does not meet S1 as the adverse impacts significantly and demonstrably outweigh the benefits). Any building here will destroy the value of Ruskin Fields. This development is unjustified. 2300+ houses have been consented for Land North of Bayswater Brook, meaning there is reduced need, and increased need for the amenity of the very short Stoke Place Lane to Headington. In 2012, the Ruskin Fields site (HELAA 463) was wholly rejected by the Planning Inspector as part of the Core Strategy and Barton AAP, the Site DPD 2012, Sustainability Appraisal and all parties (Labour/LibDem) in the Council. Remove the site from the Local Plan.	Without a detailed proposal it is not possible to understand either the benefits or harms or to weigh them up. However, it is considered that there is potential for a scheme where the benefits outweigh the harms. A different part of the field is allocated in the Oxford Local Plan 2036. The Inspector's comments quoted in the full response pre-date that.

Site no.	Site name	Summary	Response
463	Ruskin Fields – provides views	Provides views in and out of the Conservation Area, especially from the Land North of Bayswater Brook development at Elsfield, and from Stoke Place to Elsfield.	These views are noted in the site assessment.
463	Ruskin Fields – green belt	It is effectively a green belt around Old Headington.	The site does not represent a belt around old Headington.
463	Ruskin Fields – traffic levels	Unacceptable traffic caused by development - Stoke Place is the last green lane in Old Headington. Usage as a cycleway or entrance to the development will destroy its charm and inflict substantial harm on the Old Headington Conservation Area. Traffic to and from the estate will not be sustainable Old Headington is already a major hospital rat-run. The proposed road access here would exacerbate severe traffic around the John Radcliffe Hospital.	It is agreed that Stoke Place is not suitable for vehicle access. It is not considered that the amount of pedestrian or cycle use that would be generated from this site has potential to destroy the character of the lane.

463	Ruskin Fields – flooding and SuDS	(Re G7) Downstream flooding off Headington Hill from the John Radcliffe and TW sewers down Osler Road to Barton Park below is already an issue and any development here will increase flood risk. (Re G8) The groundwater level is too high at the base of the development for a SuDS system to be effective so drainage will need to be via Bayswater Brook which	The potential for SuDS will need to be explored as part of any proposals, but it is not considered there are potential unmitigable flood risk, surface or groundwater concerns from potential development on this site.
Site no.	Site name	Summary	Response
		already has LNBB and Barton Park and other developments	
463	Ruskin Fields – carbon capture	(Re R2) Large peat deposits on adjacent fields perform a valuable carbon capture role and permit an ecology identical to that of the Lye Valley SSSI.	The potential for peat will need to be explored as part of this development.
463	Ruskin Fields – housing need unjustified, will cause harm to local residents	Housing need does not outweigh substantial loss of heritage, conservation, and amenity value. It is used by residents of green space deprived areas in Barton (soon to be surrounded by Land North of Bayswater Brook dev).	The Regulation 19 plan puts forward the northern part of the fields only, leaving the southern part, where there is a pond, to remain as a wildlife corridor from west to east. The site is not accessible to the public.

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #463 Ruskin Field	Welcome direction of travel to undertake further investigation that informs next steps and help to understand the impact of the proposed development on the historic environment.	Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.	Update relevant info where applicable.

Oxfordshire County Council

Site no. and name	Summary of comment	Response	Outcome

463 – Ruskin Field	Landscape and Nature Recovery – Biodiversity This site is located within close proximity to Dunstan Park OxCityWS. Impacts to Dunstan Park OxCityWS should therefore be considered when assessing this site allocation against SA objective 10 and policy G6.	We will consider how to reflect this in the allocation policy.	Oxford City Action: Consider ecological impacts of development and where negative impacts are likely, propose suitable policy wording to mitigate.

467 - Edge of Playing Fields, Oxford Academy No

comments.

497 - MINI Plant Oxford

Site no.	Site name	Summary	Response
497	MINI Plant Oxford	A more robust policy is required to reduce surface water runoff from the very large number of hard surfaces at this site. Particularly as the complex is close to the Oxford STW. Modification proposed: Reduction in surface runoff with SUDS etc.	There is a general policy relating to SuDS, and it does not need to be repeated into each site allocation policy.

516 - 474 Cowley Road (Former Powell's Timber Yard) No

comments.

574 - Manzil Way Resource Centre

Site no.	Site name	Summary	Response

574	Manzil Way Resource Centre	This allocation should ensure sufficient consideration is given to the impact on adjoining housing. Any development should be small-scale.	Development would have to be appropriate to the scale and nature of the site and surrounding development.
574	Manzil Way Resource Centre	It is envisaged that the [Oxford Health NHS Foundation] Trust will continue to provide statutory healthcare services from this site subject to the outcome of our estates strategy review referenced above. In turn, the Trust also welcomes the housing allocation however, it may also seek to develop an element of private residential accommodation in addition to the employer-linked affordable component. It would also not wish to exclude other complementary uses on the site including improved health care facilities, associated administrative functions and extra care or student accommodation.	Comment noted.
574	Manzil Way Resource Centre	<i>(Local Plan 2040 policy is discussed in this response)</i> The phrase “<i>could be car-free</i>” should be strengthened to “<i>must be</i>” Modification requested:	The Regulation 19 draft plan policy wording is “any additional residential development should be low car”.
Site no.	Site name	Summary	Response

		Make a single statement that actually means anything or constrains anybody in any way. The “policy” is almost meaningless.	

579 - ROQ Site

No comments.

586 - Osney Mead (whole site)

Site no.	Site name	Summary	Response
586	Osney Mead	It needs to include residential use, even if it is just graduate accommodation.	The site allocation includes residential use.

587 - ARC Oxford

Site no.	Site name	Summary	Response

587	ARC Oxford	Although some of this site has been built on there are areas which remain vacant and has done so since the 1990's when the old Rover factory was demolished. The rate of new build has slowed down completely, and the vacant sites are very much as they were in 2016 when Policy SP10 was written. The Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.	We maintain a regular dialogue with various stakeholders, including landowners. The landowner for this site has been working towards a planning application, which has recently been submitted (October 2025). This planning application covers the remaining vacant plots that do not already have planning consent.
587	ARC Oxford	Do not build on Green Infrastructure. Use contributions to make the site usable by the community from Cowley in particular.	Other policies in the plan specifically address the city's green infrastructure. These policies create a hierarchical evidence-based approach for the protection of the city's green infrastructure network. Developer contributions are often needed to fund a range of infrastructure requirements, including community infrastructure. Developer contributions must also meet specific
Site no.	Site name	Summary	Response

			legal tests which govern their application.

588 - Oxford Science Park (whole site)

Site no.	Site name	Summary	Response
588	Oxford Science Park	The Local Plan recognises the importance of the 'Area of Focus' and Oxford Science Park in particular for employment purposes. The Local Plan Preferred Options consultation document recognises that there are significant regeneration opportunities throughout this area, with the ability to intensify and modernise the key employment sites. It also recognises the role that the opening of the Cowley Branch Line can play in improving connectivity to and from this area. EIT support the general approach advocated by the Local Plan for this area. The Oxford Science Park, and the Area of Focus more widely, has seen growth in recent years, but it is agreed that there is significant potential for development in this area. The masterplan work being undertaken by EIT is in general conformity with the approach advocated by	Support noted. We keep an ongoing dialogue with various stakeholders, including landowners. As part of our Reg. 19 Plan preparation, we have subsequently met EIT representatives to discuss various aspects of the plan.
Site no.	Site name	Summary	Response

		the Local Plan consultation, but EIT would welcome further discussions on the specific policy requirements as the Local Plan progresses to the next stage.	

613, 614, 615 – Botley Road sites around Cripsey Road including River Hotel and Westgate Hotel

Site no.	Site name	Summary	Response
613-615	Botley Road sites around Cripsey Road including River Hotel and Westgate Hotel	Given the committed site allocations in the adopted Local Plan that include retail floorspace (Churchill Hospital / Diamond Place and Ewert House / Island Site / Oxpens / Osney Mead / Oxford Railway Station / Kassam Stadium) together with the planning permission at the Clarendon Centre, the potential new allocation inclusive of retail floorspace at the Botley Road sites around Cripsey Road is questioned given the evidence of over-supply of floorspace for purposes within class E within the city centre, endorsed by lack of capacity for new retail and leisure floorspace evidenced by the Retail and Leisure Study.	The Reg. 18 consultation document sets out the land uses proposed by the landowner (rather than setting out a policy for the site). There is already an existing retail use at the site. The main use proposed at the site is residential. Any additional retail proposed through a planning application would need to demonstrate compliance with other policies in the plan, given the site's location, just outside the city centre boundary.
613-615	Botley Road sites around Cripsey Road	The River Hotel is a much-loved historic building bringing a beautiful garden and green space to Botley	Consultation with the local community is required early in the

Site no.	Site name	Summary	Response
	including River Hotel and Westgate Hotel	Road. Much of the character of the area would be lost by demolishing these buildings. Consultation with the strong community of west Oxford is essential.	planning application stage. The buildings are not considered to be of the kind of significance that means that new development would or could not be preferable.
613- 615	Support	ChCh supports the future allocation of the following sites in its ownership: SHLAA Sites 613-615: Various buildings on Botley Road, Abbey Road, Cripsey Road, Mill Street and Barrett Street; SHLAA Site 616: St Thomas School House and Osney Warehouse, Osney Lane.	Support noted.

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #613-615 Botley Road sites around Cripsey Road	No site appraisal form published? There are heritage sensitivities that need to be considered, including impacts on the approach to Osney Town conservation area, and potentially wider views.	It appears this was erroneously missed off the published list.	We will ensure this is available for the next consultation.

616 – St Thomas School and Osney Warehouse

Site no.	Site name	Summary	Response
616	St Thomas School and Osney Warehouse	We have no in principle objections to the allocation of this site. However, the former St Thomas School building is Grade II listed and sufficient weight needs to be given to its retention and preservation within any forthcoming policy text. Built around 1870 the building is a good example of a late 18th century school building, whilst also providing a remnant of the historical evolution of the evolution of the St Thomas's parish and those who lived there. A respondent asked us to contact them as they have detailed information on the history.	The site is undoubtedly sensitive in terms of the potential impact of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets and should respond carefully to that.

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #616 St Thomas School and Osney Warehouse	Concur with comment on page 181 that the site possesses "heritage interest that needs further investigation". This includes any impacts on character and appearance of the Central conservation area.	Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.	Update relevant info where applicable.

624 - Land south of Frideswide Square

Site no.	Site name	Summary	Response
624	South of Frideswide Square	The gateway from the west must be improved not destroyed and assume the historic Jam Factory is to be preserved. Wary of too much retail. City centre needs support. Failed retail in Frideswide Square. Buildings provide a distinctive and visibly C19th character to the station area.	The Jam Factory is a listed building and policies relating to design and heritage will ensure high quality development that conserves the Jam Factory. Active ground floor level frontage is important in this central location near the station, but there is not requirement for retail specifically.

657 - Clarendon Centre

Historic England

Site no. and name	Summary of comment	Response	Outcome

Site #657 Clarendon Centre	Clearly this an important site in the Central conservation area and close to numerous historic buildings, not least Carfax Tower, an important local landmark. Its central position means that it has significant potential to impact on the Oxford skyline, reflected in our comments on the proposed development that secured	Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.	Update relevant info where applicable.
Site no. and name	Summary of comment	Response	Outcome
	planning permission last year. We would expect to see reference to these sensitivities in any associated allocation policy.		

658 - Barton 3b (Land to the rear of Harolde Close, previously included in the Barton Area Action Plan area and outline application)

Site no.	Site name	Summary	Response

658	Barton 3B (Land to the rear of Harolde Close)	When Barton Park was built, the land was raised due to the extreme flood risk of building on a flood plain in the middle of a climate crisis. This had the effect of causing back-pressure on Bayswater Brook which means that the part of Barton Village Road as marked below along the stream is now flooded regularly. The stream going along the west side of the Site is partially culverted and has existed as a natural stream before as shown on early OS Maps, this floods in storm conditions and flows rapidly due to the steep slope to Bayswater Brook.	No longer being taken forward as a site allocation
Site no.	Site name	Summary	Response
		Further, the site is now very overgrown with mature trees, and is a haven for wildlife, this would be contrary to all policies in the OLP2042 relating to green space, ecology and environment.	

658	Land off Harolde Close	Opposition to the plan to build on the green belt north of Bayswater Brook. I do not see this development as justified when other brownfield and city sites could be found for affordable housing. The wrecking of this prime green belt land is indefensible and is motivated by landowner and developer greed.	No longer being taken forward as a site allocation

660 - 2 Harberton Mead

Site no.	Site name	Summary	Response
660	2 Harberton Mead	Possible green space loss and increase in run off must be addressed.	No longer being taken forward as a site allocation.

Historic England

Site no. and name	Summary of comment	Response	Outcome
2 Harberton Mead	Clearly this needs consideration with respect to any impacts on the character and appearance of Headington Hill conservation area.	Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.	Update relevant info where applicable.

664 - Jowett Walk (South)

Site no.	Site name	Summary	Response
664	2 Jowett Walk (South)	Concern over allocating even more land for student accommodation than already and therefore displacing other Oxford residents.	The site was put forward by the landowner as part of the Call for Site process.

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #664 Jowett Walk (South)	Clearly this lies within the central conservation area and close to multiple listed buildings, so care is needed to respond sensitively.	Thanks for comment we will update where needed and	Update relevant info where applicable.

Site no. and name	Summary of comment	Response	Outcome
	Site assessment published for the proposed allocation on Jowett Walk states that the site contains “no identified historic building constraint”; while it does not contain listed buildings, it is adjacent to numerous such designated heritage assets.	where the allocation is carrying forward.	

Comments on All Site Allocations

This section contains all comments received regarding all site allocations, including public and statutory responses.

Policy	Topic	Summary	Response
General comment on site allocations	Recreation grounds, green spaces	It is wrong in principle/law to build on recreation grounds/playgrounds/pitches without alternative adequate provision being made. 'Alternative provision' will be manifestly inadequate. More houses=more people=more need for civic provision, so there should not be any houses on these needed spaces. Loss of them=degradation of quality of life. Green spaces are particularly important in dense areas and where they act as wildlife corridors. Everyone should have areas of beauty, tranquillity and wildlife within reach. Developing on these spaces will harm fragile local infrastructure, particularly water supply, drainage and sewage disposal. Many brownfield sites and underused properties should be used first and the local plan should bear down on these, not green spaces. Shouldn't be developing new sites for future needs-should only worry about present local residents' needs.	The Local Plan protects and network of green spaces, including a core network which it is important to retain in situ, and a supporting network. Within the supporting network, there may be potential for re-provision of the green space functions of the site, so development may be possible if that can be achieved. It is not assumed from the outset that alternative provision that is adequate cannot be made. The majority of the supporting network is not allocated, and even on the supporting network it may be difficult to find solutions for re-providing the green infrastructure functions. However, where there is interest in developing the site and potential means of re-provision of its functions seem to be attainable, then an allocation can be made.

Policy	Topic	Summary	Response
General comment on site allocation policies	Accessibility to Oxford rail station	I notice that a lot of the Interim Regulation 18 stage site assessment forms note that a high number of proposed developments are a significant distance away from Oxford railway station. It is therefore very clear that the Cowley Branch line needs to happen ASAP, not least to fulfil the government's Oxford-Cambridge Arc – the hightech developments are in southeast Oxford, and it's just so difficult to get there from the railway station. This is a fault of geography, but needs to be factored in.	Comment noted.
General comment on site allocations	Transport connections	Proper north-south, east-west links are needed to support developments- cycle highways or even trams.	As Highways Authorities, Oxfordshire County Council has worked with us on the Infrastructure Development Plan, and needs in each quadrant of the city are listed within Chapter 8.
General comment on site allocations	Wrong to have these policies	The City Council should not be making such decisions about property. Just let them build.	Positively managing development is the purpose of the planning system.
General comment on site allocations	Too few	There are too few site allocations.	Oxford does have a shortage of available and suitable sites, due to the tightly drawn boundaries. To be allocated, there has to be some certainty a site will come

Policy	Topic	Summary	Response
			forward. However, other sites may well come forward as windfall.
General comment on site allocations	Community uses are also important	Some sites should be for community use, not just housing and there must be access to facilities and services such as community centres, entertainment, medical services.	Chapter 7 of the draft plan includes a suite of policies to ensure good access to a range of facilities important to local communities.
General comment on site allocations	BBOWT	We have also looked at the individual PDFs for the site allocations we have commented on. These however provide little detail making it difficult to assess the potential impact of development on the surrounding natural environment. For example, no information regarding the proposed development quantum is given in the site policies despite this information being essential for assessing potential impacts – e.g. it makes a big difference whether a site is proposed to deliver 10 units or 50 units. Whilst it might be beneficial for policies not to be too descriptive (e.g. if insufficient masterplanning and capacity work has been done to determine a feasible quantum) we believe that at this stage in the LP process policies should provide at least an approximate or ‘up to’ estimate together with a clear set of criteria against	Capacity assessment forms have been produced to inform the site allocation policies. These will be published as part of the evidence base at the next consultation stage (Reg. 19). Whereas the site assessment forms published to support the Reg. 18 consultation were produced as part of the Sustainability Appraisal. The interactive map published at Reg. 18 included a layer which showed the locations of the proposed sites in the city as well as various other layers such as green infrastructure, ecological designations,

Policy	Topic	Summary	Response
		which the development will be considered. An indication of housing numbers for residential allocations should be included at the next stage of consultation. We have not been able to find any detailed maps showing which parts of the allocated sites are considered appropriate for development, which areas are for wildlife-rich green space etc. Such maps should be provided at the next stage of consultation. to accompany the individual site allocation policies although this information is essential to help locate the site on the policies map and to provide clarity on the boundaries. We ask the Council to address this shortcoming and to provide more information and a map with its policies.	heritage considerations and flood mapping for the city. We will publish maps showing the locations of each site in the chapter and the policies map will also show their location, alongside a variety of other policy considerations that have a spatial dimension.

Natural England

Topic	Summary	Response	Outcome

Site allocations	The plan should allocate land with the least environmental or amenity value (NPPF para 171). Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected. Land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. <i>General advice is provided as part of the annex to submitted comments.</i>	The process for determining site allocations will be discussed across the Sustainability Appraisal and a separate background paper on site selection. We are also regularly discussing the preparation of our HRA with you and will continue to do so.	Sustainability Appraisal and site selection background paper to be published at Reg 19 along with HRA. Discussions to continue with Natural England as and when needed.
Site allocations	Natural England note that a number of site allocations are within close proximity to designated sites. Where this is the case, it will be necessary to ensure a robust assessment of impacts is undertaken and appropriate mitigation can be provided and secured. It is Natural England's advice that sites which would result in unavoidable impacts	As noted earlier, we are undertaking a Source Pathway Receptor Analysis for the SSSIs as well as Habitats Regulations Assessment for the SAC and this will help identify all the relevant sites that might impact on	Source Pathway Receptor Analysis and HRA work to be published alongside Reg 19 consultation. Key findings will be reflected in relevant allocations including sitespecific mitigation
Topic	Summary	Response	Outcome

	and/or where mitigation cannot be secured, should not be pursued.	these designations, in line with your comment. We will ensure any recommendations from that work, including sitespecific mitigation requirements, are reflected in the relevant allocation policies.	requirements where necessary.

National Highways

Topic	Summary	Response	Outcome
Chapter 8 – site allocations	Three residential sites border the SRN. These are sites 113, 1e and 463. No employment sites border the SRN. These sites will need to pay close attention to the impact on the SRN during planning application stage and National Highways would expect to be consulted further on these sites when proposals come forward. Whilst a traffic impact assessment has yet to be performed there is an expectation for a potential	Traffic Modelling has been undertaken that looks at the impact of all development sites proposed to support the city's growth over the plan period as part of HRA work. This work shows that the impact of Oxford city's growth on the SRN (i.e., the A34), is less than 1,000AADT.	At the meeting, the City Council and National Highways agreed that the issues raised within National Highways response to the Reg. 18 Plan consultation had been satisfactorily resolved.
Topic	Summary	Response	Outcome

	impact on the strategic road network due to the number and proximity of sites to our network.		

Oxfordshire County Council

Topic	Summary	Response	Outcome
Proposed New Site Allocations	Strategic Planning The County Council has an interest in how the City proposes to address housing need as any new allocations are likely to have implications in respect of the County's statutory functions. The Local Plan will need to address the identification, provision, funding and overall deliverability of the infrastructure and County Council services needed to support sustainable development. As such, we will continue to encourage regular communication between relevant parties. For sites to be allocated outside of the City for Oxford's unmet need, the County Council's main concern is that they are well connected to Oxford and provide the best opportunities for making use of existing and proposed transport infrastructure, including enhancing and	Noted. We will continue our dialogue with the County as the site allocation process move forward.	Oxford City Action: Continue working with the County Council to draft site allocation policies
Topic	Summary	Response	Outcome

2772

	making better use of sustainable public transport and active travel links into Oxford. At this stage, the proposed additional sites do not provide details regarding capacity therefore the County Council cannot comment on potential infrastructure requirements.		

Topic	Summary	Response	Outcome
Site allocations	The information contained within the new Local Plan will be of significant value to Thames Water in future infrastructure planning, but the draft allocations do not have housing numbers at this stage. Would welcome more details on the proposed developments when they become available and also an early contact from the developers.	See earlier response re: recommending developers undertake early engagement with Thames Water. Full site allocations with minimum housing numbers will be published as part of the Reg 19 consultation and we would welcome additional engagement with yourselves on them through that process or separately.	No further action – additional engagement to be undertaken in due course.

Thames Water

Site Allocations from LP2036 or LP2040

This section contains queries regarding the site allocations from the previous local plan LP2036 or LP2040 which was withdrawn (see the Introduction and Local Plan Timeline sections of this report for more context).

Local Plan	Topic or location	Summary	Response
LP2040	Development sites	The OLP2040 had complete site allocation policies, now these seem to have simply disappeared without updates as already allocated, but whether already allocated or not, there are always policy updates required as circumstances change.	The Regulation 19 draft LP2045 will include detailed site allocation policies.
LP2040	Policy SPS10: Knights Road	Headington Heritage: This policy is longer included within the Reg. 18 Plan. Site should be not allocated as site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford). Cumulative impact of other developments on green space. Surface flooding will lead to sewage discharge at Oxford Sewage Treatment Works.	LP2045 does not propose a site allocation for this policy.
LP2040	Policy SPS17: Edge of Playing Fields, Oxford Academy	Headington Heritage: This policy is longer included within the Reg. 18 Plan. Site should be not allocated as site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford).	LP2045 does not propose a site allocation for this policy.
LP2040	SPE3 – Headington Hill	Headington Heritage: Policy now removed – previously in LP2040.	LP2045 does not propose a site allocation for this policy.

Local Plan	Topic or location	Summary	Response

	Hall and Clive Booth	Very substantial damage has been done to Headington Hill Conservation Area by thoughtless insensitive development by OBU. Cuckoo Lane, in particular has been damaged by a “welcome glade” and expansive views of ugly buildings. Much of this site boundary is in the most sensitive part of Cuckoo Lane yet this is not even mentioned. Modification Requested: Deep foundations or hard surfaces can affect ground and surface water flows. Greenfield run off be required. “...supporting the setting of the conservation areas” should be changed to “not harming” this, is IN the Conservation Area. Headington Hill has calcareous springs or surface water as map per below, showing TUFA, Fen and probable peat reserves in and around Headington Hill Park.	

Local Plan	Topic or location	Summary	Response
		Modification requested: Site allocation policies should include a requirement to undertake hydrological and fen survey, and recovery where possible.	
LP2040	SPE4 – OBU Marston Campus (LP2040)	Headington Heritage: Policy now removed – previously in LP2040. No indication as to why SUDS are required here and not elsewhere, the Marston SSSI impact zone is a very wide area. Headington Hill has calcareous springs or surface water as map per below, showing TUFA, Fen and probable peat reserves in and around Headington Hill Park. Modification requested: Site allocation policies should include a requirement to undertake hydrological and fen survey, and recovery where possible.	Site is included as an allocation in the 2045 plan. The allocation policy will include requirements to mitigate the potential impacts on the New Marston SSSI.
LP2036	329 - Valentia Road	OLP2036 included a policy that allocated this site for housing (10 dwellings). The site does not feature on the list of potential policies in the new local plan. Concerned that	LP2045 does not propose a site allocation for this policy.

Local Plan	Topic or location	Summary	Response
		policy will not be carried forward as capacity is potentially less than 10 dwellings. Modification requested. Include a policy for this site backed with evidence and clear policies re groundwater catchment.	
LP2036	622 - Coolridge Close	OLP2036 included a policy that allocated this site for housing (10 dwellings). The site does not feature on the list of potential policies in the new local plan. Concerned that policy will not be carried forward as capacity is potentially less than 10 dwellings. NO further development should be permitted in the Lye Valley this is in the groundwater catchment of the Lye. Modification requested. Include a policy for this site backed with evidence and clear policies re groundwater catchment.	LP2045 does not propose a site allocation for this policy.

LP2036	629 - Wood Farm Health Centre	OLP2036 included a policy that allocated this site for housing (10 dwellings). The site does not feature on the list of potential policies in the new local plan. Concerned that	LP2045 does not propose a site allocation for this policy.

Local Plan	Topic or location	Summary	Response
		policy will not be carried forward as capacity is potentially less than 10 dwellings. NO further development should be permitted in the Lye Valley this is in the groundwater catchment of the Lye. Modification requested. Include a policy for this site backed with evidence and clear policies re groundwater catchment.	
LP2036	SPE10 - Hill View Farm	(LP2040 Policy Reference) Do not include policy as a site allocation as planning application has been approved	LP2045 does not propose a site allocation for this policy.
LP2036	SPE11 - Land West of Mill Lane	(LP2040 Policy Reference) Do not include policy as a site allocation as planning application has been approved	LP2045 does not propose a site allocation for this policy.

LP2036	SPE12 - Marston Paddock	(LP2040 Policy Reference) Do not include policy as a site allocation as planning application has been approved	LP2045 does not propose a site allocation for this policy.

Additional Site Suggestions

This section contains public queries or suggestions for site allocations.

Location	Summary	Response
Telephone exchanges across Oxford	There are at least four telephone exchanges in Oxford: Speedwell Street, Oakthorpe Road in Summertown, Headington and Cowley. Conventional landlines are being phased out. As a result, some or all of these may be decommissioned during the lifetime of the plan and may become available for development	At the current time these sites are not available, and there has been no indication from the landowners or leaseholder that they will be available in the plan period.
Butts Lane, Marston	Previously submitted in Call for Sites and previously assessed as part of wider Green Belt parcel 114a in 2023 GB assessment. Request a thorough Grey Belt and Green Belt assessment of the land in isolation from the rest of 114a. The site is Grey Belt and offers a sustainable, previously-developed site for up to 20 homes.	The majority of this site (114e) has been put forward as a site allocation policy in the draft plan and included in the SHLAA.

Pullens Lane, Headington	Carter Jonas is instructed by the Morrell Family Trust (“the Trust”). The Trust owns the Pullens Lane Allotments (“the Allotments”), which are located adjacent to Oxford Brookes University’s Clive Booth Student Village in Headington. The allotments are in fact surrounded on all four sides by existing development, as shown on the plan appended	The Strategic Housing Land Availability Assessment (SHLAA) will be published as part of the Regulation 19 consultation. There is not a surplus of allotments in the city and allotments are part of the Core Green Infrastructure Network because they are important to protect in situ.

Location	Summary	Response

	to this letter. The Trust (via Carter Jonas) has submitted the Allotments for the Council's consideration during "Call for Sites" exercises in 2021 and 2024. We look forward to understanding the Council's assessment of the site in the next update of the HELAA when it is published. It is disappointing that there is not an up-to-date HELAA to support the current consultation. The Trust's land interests at Pullens Lane have strong potential for future development in Oxford City Council's new Local Plan 2042. The Trust considers that the Allotments would be suitable for new residential (use class C3) or student accommodation. The Pullens Lane Allotments are far from well utilised and have only been partially used for some years. The Allotments could be made available for development within the next 5 years. The site is well located within Oxford City and benefits from being within walking and cycling distance of a range of services and facilities. Furthermore, it is within a reasonable walking distance to several bus routes, including key bus routes serving Oxford City Centre, and beyond.	

Location	Summary	Response
	The Trust has access rights to the site via John Garne Way to the west, and while it is accepted that Pullens Lane might be an alternative access route and is a single lane carriageway, it is maintained to a high standard. Moreover, there is the potential in this location to consider a reduced vehicle type development like those which the Council is promoting elsewhere in the city. Therefore, in short, there is ample access to the site. Development in this location would constitute sustainable development in accordance with the presumption in favour of sustainable development, as set out in national policy. The Trust is very concerned that the Council has taken a very broad approach to managing allotments in the draft Local Plan. It states in the Local Plan, in the preamble to draft Policy G1 – Protection of Green Infrastructure that the disposal of allotments requires application to the Secretary of State and is only consented in exceptional circumstances. This is not	

Location	Summary	Response
	the case in every circumstance: The Allotment Act 1925 generally does not apply to private allotments. The Act primarily focuses on allotments provided by local authorities and those created under specific statutory provisions, not privately owned or managed plots. The Trust strongly objects to the proposed 'protection' of its land for allotments through policy G1 - as shown on the consultation policies map. There is no clear justification for this approach, and as a private allotment site it is not subject to the same controls as other allotments which are owned by the Council. The Trust would urgently like to discuss the Council's proposed and currently unjustified approach to its land in the emerging Local Plan.	
Oxford Golf Club, Hill Top Road	This should be allocated- it is private land not accessible to the public. The site is huge and sustainable. The parts of it of less landscape value should be developed.	Currently, the site is on a long lease to the golf club, with no current interest from the landowners in developing the site.

Blanchfords, Headington	Surprised that the former Blanchfords building supplies depot in Headington is not listed as it seems a prime site for development.	Every effort has been made to ellicit a response from the landowner, but without any apparent interest from the landowner in bringing forward the site for development, for now we have to assume it will remain as a timber yard.

Location	Summary	Response
		The general policy approach of the plan would allow development of the site for housing, should it come forward, without an allocation being needed.
South Parade, Summertown	This could be added to the list as it is an area in need of rejuvenation, with the opportunity for land assembly and development, including improvements to the public realm.	There is no clear opportunity here at the current time, with a wide range of landowners and mix of well occupied buildings.
Ultimate Picture Palace, Cowley	Would like there to be protection for this.	General policies protect cultural uses, with some flexibility to respond to changing needs. Protecting each facility individually is not needed or appropriate.
Ellison Institute, Littlemore	Something should be said about this, restricting too much building on the site.	It is not considered appropriate to have a policy restricting development of this site.

Oxford North	Oxford plays an important role in national economy. There is significant potential for employment and housing to meet local and Oxford's needs at Science North, the area between Oxford Parkway, Oxford North and London Oxford Airport.	The Local Plan can only cover the City Council's administrative boundaries. There is a dedicated site allocation policy for Oxford North which indicates that planning permission will be granted for mixed-use development including residential and knowledge-economy employment.

All Public Responses to the Whole of Chapter 8

Draft policy	Topic	Summary of comments	Response

Chapter 8	Infrastructure with new development	In the site allocations there are many mentions of new housing, but no specific mentions of schools or GP surgeries. Are current facilities expected to absorb the increase in the residential population?	Policy S3 and the accompanying evidence (the Infrastructure Deliver Plan (IDP)), set out the infrastructure needed to support development in the plan. The IDP sets out a list of specific projects identified to mitigate the impacts of planned development. As part of the plan-making process, we work with infrastructure delivery partners to identify and deliver the necessary infrastructure to support growth proposed in the Local Plan.
Chapter 8	Culture	The section on "city of culture" contained no questions on culture. What community facilities do you think contribute to Oxford's	These facilities fall under use class F2 which are considered community facilities.

Draft policy	Topic	Summary of comments	Response
		mission? What is the position on concert halls, galleries, museums?	

Chapter 8	Food growing spaces	More edible plants in community areas	We agree food growing spaces can also contribute to biodiversity (and vice versa) where they are designed appropriately. Criterion i of policy G2 already sets this out as one of the benefits that should be explored.
Chapter 8	Support for golf course	Keep the golf course if you are serious about local recreational amenities, green spaces, flood control and biodiversity. Golf keeps people fit and healthy!	The policy approach is to require re-provision of the community facilities.
Chapter 8	Sports facilities	Infrastructure for open space, sport and recreation must be informed by evidence (see paragraph 103). The Council needs to complete the review of its Playing Pitch Strategy and undertake to update its built sports facilities strategy. The new infrastructure needs identified should then be added to the Council's infrastructure development plan.	Policy S3 and the accompanying evidence (the Infrastructure Deliver Plan (IDP)), set out the infrastructure needed to support development in the plan. The IDP sets out a list of specific projects identified to mitigate the impacts of planned development. As part of the plan-making process, we work with

Draft policy	Topic	Summary of comments	Response

			infrastructure delivery partners to identify and deliver the necessary infrastructure to support growth proposed in the Local Plan.
Chapter 8	NHS dental practices	More NHS dental practices.	Policy S3 and the accompanying evidence (the Infrastructure Deliver Plan (IDP)), set out the infrastructure needed to support development in the plan. The IDP sets out a list of specific projects identified to mitigate the impacts of planned development. As part of the plan-making process, we work with infrastructure delivery partners to identify and deliver the necessary infrastructure to support growth proposed in the Local Plan.
Chapter 8	Canal improvements	The remaining sections of canal towpath beyond the existing improved area should be considered for improvement to provide a	Areas within Cherwell District boundary are outside of OCCs control.

Draft policy	Topic	Summary of comments	Response
		suitable standard throughout and to join to other improvements within Cherwell district which may be forthcoming as a result of housing allocations.	
Chapter 8	Proposal for an Air Cable Transport system	An Air Cable Transport system running from Redbridge Park and Ride to Westgate shopping centre. Run by bus companies, this would provide a quicker, more reliable route for tourists and commuters into the city. By providing parking for tourist coaches at Redbridge and an attractive alternative, that is a tourist attraction in its own right, we could greatly reduce the number of tourist coaches entering the city.	Noted.
Chapter 8	Park & Ride for Cowley	One thing that would really help is a Park & Ride for Cowley. It could be on the Unipart site or the Oxford Stadium site; this would provide excellent transport links to both Cowley Road (whose businesses are dying, coincidental to not being on a Park & Ride bus route) and the surrounding business/innovation areas. It's also needed for those people who have essential but low-paid jobs and who can't	Reasons for permitted uses in Unipart policy are set out in site allocation form.

Draft policy	Topic	Summary of comments	Response
		afford to live closer and have to get to work at non-peak hours (for example, a nurse who lives in Brize Norton, for example, has to drive to the JR rather than get the bus).	
Chapter 8	Transport	Transport. We desperately need the park and rides to be further enlarged and ideally for the service to be free. In addition, smaller buses on new routes between different parts of the city, rather than as currently having to go into the centre and then out. The LTNs need to be revised - e.g. the barrier in Crowell Road should go! And proposals for bus gates or congestion charges should be scrapped.	Noted. The County Council as Highways Authority does take a lead in overall transport strategy.

Chapter 8	Safeguarding of land	EWR Co considers that the local plan could also better inform stakeholders and users of the document by providing information about the EWR route safeguarding in the local plan and on the local plan policies map. EWR Co has issued guidance for local authorities and developers on the implications of the safeguarding directions for both the determination of planning applications and the preparation of local plans. Paragraphs 24 to 29	A new Policy on safeguarding is now included in Chapter 8 of the Plan- Policy I2, which includes reference to EWR.
Draft policy	Topic	Summary of comments	Response

		of the guidance deal with the implications for local plans and advise that: • The area safeguarded should be represented on the policies map (in accordance with regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) • Local Planning Authorities (LPAs) should not include proposals in the local plan that conflict with the safeguarding directions • Local Plans should state that the safeguarding directions have been made by the Secretary of State for Transport, they are not proposals of the LPA and the route of EWR will not be determined through the local plan process; it will instead be subject to an application for development consent under the Planning Act 2008. As it stands EWR Co considers that the plan is deficient in that it makes no reference to the safeguarding of the EWR route, either within the local plan itself, or on the interactive policies map. This should be rectified in the submission	

Draft policy	Topic	Summary of comments	Response
		version of the local plan so that all who may have an interest in the future development of sites in the city can take the potential impact of EWR into account in designing their development proposals and can take appropriate steps to avoid and/or mitigate any potential impacts which might otherwise prejudice the delivery of parts of the EWR route.	
Chapter 8	Consult with NESO (electricity)	National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET. Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will	Comment noted and database updated.

Draft policy	Topic	Summary of comments	Response
		be replaced with sources of low-carbon electricity, such as offshore wind farms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South.	

General Comments Collected During Consultation

Topic	Summary	Response
15-minute cities	Support for the 15-minute cities concept – it was not publicised well, but it has worked in other cities.	Noted.
Recreation grounds	These sites are used by residents, football teams and clubs from all ages and all walks of life. To lose these would be at the detriment of the area and locals, especially young people.	The detailed site allocation policies seek reprovion of sports facilities.

Clarity over how housing figures have been reached	There should be greater clarity regarding: • the capacity for housing within the city's administrative boundaries; • why the plan period start date of 2022 has been chosen; • how the housing figures from the existing OLP and the extant Local Plans for neighbouring local authorities relate to the housing requirement over the new plan period; and • the approach to be taken to meeting residual unmet need.	Since the Reg 18 consultation the plan period has been adjusted to 2025 – 2045. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.
More deference to national policy	Re-stating the NPPF's contaminated-land rules, the Environment Act's 10 % biodiversity-net-gain requirement or the Future Homes Standard's net-zero-ready fabric provisions does not enhance protection; it merely piles extra reports onto applicants.	The city has a local net zero target of 2040 and the national requirement is 2050. Many policies are bespoke to ensure we meet this target.
Council tax is too high	The excessive regulation enforced by the Council means Council Tax is too high. People can't afford to buy houses because they are having to subsidise social housing.	This is beyond the remit of Planning.
Transport issues	• Please could you find ways to stop cars and traffic dominating our city? • Please could you make park and ride work?	The City Council will continue to work with the County Council to identify potential solutions to these issues, with the aim of enhancing
Topic	Summary	Response

	• Please could you stop stationary traffic where queues of drivers try to get into the Westgate Centre? If that continues to be the reality once the Botley Road is open again, it will be very bad. • Please could you find ways for cyclists to be able to use the roads without confronting potholes and drain covers with large gaps around them? • Please could you find a way for cyclists to go east west without having to dismount from their bikes? • Please could you stop buses driving up Queen Street? • Traffic congestion is significantly caused by private school drop-offs. • Proper cycle highways and trams needed to connect the city. • Move the coach station to the Becker street carpark next to the main station to save public transport network and pedestrian accessibility.	public realm. However, the details of this work, and implementation of schemes, will be led by the County Council as Highways Authority and are outside the realm of the Local Plan.

Supporting Documents and General/Other Responses

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Headlines:

- General responses look at the overall consultation process
- Other general responses mentioned various transport issues
- There are sections looking at general comments about supporting documents for the Local Plan, such as the Sustainability Appraisal, Health Impact Assessment, Background Papers, and Evidence Base.

Supporting Documents

Sustainability Appraisal

All Public Responses

Topic	Summary	Response
Don't deter housing development	Care needed not to make things too bureaucratic when it comes to housing development. The crisis is acute and builders should not be deterred from delivering.	The Sustainability Appraisal process is a tool that helps to inform the development of the Local Plan. It does not, in of itself, create any additional burden for developers when they come to making an application.
General	It seems quite thorough	Comment noted.
More focus on environmental improvements	Needs more focus on Oxford to be green, blue, clean air, low car, big on public transport, litter free, with penalties for cars parked on curbs. Other similar comments including need for more community gardens with edible plants and food forests, as well as even greener developments (more trees for shade) and more solar panels on buildings.	The Sustainability Appraisal framework addresses these various considerations across several of its objectives (e.g. Objective 7 Green Infrastructure; Objective 8 Traffic and Air Pollution). As set out above, the SA's role is to help inform the development of the Local Plan, which in of itself has various policies across Chapter 4 and 7 which address different aspects of this comment where appropriate.
More focus on educational inputs	The sustainability appraisal has taken consideration on environmental conservation and health but is lacking educational inputs. These should cover diversity and inclusion, British culture, political systems, institutions, laws, community concepts, religions, ethnicities and local history regardless of where residents are from.	We will look to draw these considerations into the relevant underlying background papers where they are not already mentioned and where this would be of relevance to the Local Plan.

Public transport	Sustainability appraisal is lacking proposals for making public transport viable and attractive.	The Sustainability Appraisal helps to inform the development of the Local Plan. The Local Plan
		includes a range of policies intended to support access to public transport.
Sustainability issues not taken seriously	A couple of comments flagging concern that report does not take sustainability seriously and that there is too much focus on growth without due concern for climate change, protecting environment, the health/needs of local residents.	A key role of the Local Plan, which the Sustainability Appraisal helps inform, is about guiding growth to happen in the right way for the city. Nevertheless, the Sustainability Appraisal framework which is used throughout the report includes objectives that address all three pillars of sustainability (the environmental, social and economic).
Site specific scoring	Comments on sustainability appraisal scores for particular sites in their interim site assessment forms.	The Council will be reviewing the sustainability appraisal scores for all the sites being taken forward to Regulation 19 and updated forms will be published alongside this report. Scores will be updated where appropriate.

Topic	Summary	Response	Outcome

SA	While the Sustainability Appraisal (SA) purports to test three housing options, the assigned SA scores, especially for the City Council's preferred Option B, lack clear and transparent justification. It is not evident why Option B consistently receives more positive scores than Options A or C in numerous instances. This appears to be based on an incomplete assessment. The SA commentary itself indicates that judgements are made without considering the full sustainability impacts of unmet housing need being accommodated outside the City's administrative boundary. Crucially,	While the assessment of cross boundary impacts does represent a part of the SA/ SEA process, when assessing the sustainability impacts of the plan, it is important that the core assessment focuses on the impacts of the strategy within the	We will take steps to ensure that the SA is legally compliant

Statutory Consultee Responses

South Oxfordshire District Council and Vale of White Horse District Council

Topic	Summary	Response	Outcome

	the sustainability impacts of cross-boundary housing provision do not disappear at the border; they are displaced. These distributed impacts, particularly those associated with Option B's reliance on external provision, could be worse than those of Options A or C. For example, accommodating development across more dispersed areas, potentially distant from Oxford's public transport routes, is highly likely to lead to increased car dependency and significantly higher carbon emissions due to longer commuting distances. SA Objective 3: The testing under SA Objective 3 focuses primarily on judgements related to densities and the loss of green space. However, it fails to explicitly evaluate the impact of the options on the Green Belt, despite the Green Belt being directly mentioned within the scope of SA Objective 3 itself. This is a significant omission. SA Objective 7: SA Objective 7's conclusions are based on the identical impacts of density and green spaces already assessed under SA Objective 3. This is unnecessary duplication of testing and analysis, which raises questions about the thoroughness and efficiency of the SA process. A robust and unbiased re-evaluation of the housing options should be undertaken. Oxford Wastewater Treatment Work is mentioned in the Sustainability Appraisal as important infrastructure to upgrade to enable growth in and around Oxford (page 47). This is located within South Oxfordshire and facilitated by the adopted and emerging Plans of South Oxfordshire, but South Oxfordshire District	local authority administrative area. Any assessment of the crossboundary implications of delivering homes outside of Oxford's administrative boundary would depend on where these homes would be delivered – this is not something that is within the City Council's procedural jurisdiction. The location of the new homes delivered outside city boundary (including those to meet Oxford's unmet housing need), is a matter for each partner authority to engage with in the production of their own plans. The City Council is aware that homes previously allocated in neighbouring districts Local Plans to meet Oxford's unmet housing need were done	

Topic	Summary	Response	Outcome
	Council isn't mentioned as a partner to work with on the delivery of the necessary upgrades.	so as close to the city as possible. SA Objective 3: we will look to ensure that the findings of the Green Belt assessment are incorporated into the SA report for transparency. SA Objective 7: the SA Framework provides the key SA indicators that are considered for each SA objective. Noted – Thames Water are leading on this project and they will be involving partners as appropriate.	

Health Impact Assessment

All Public Responses

Topic	Summary of Comments
Future health implications	The HIA should ensure future health of Oxford and provide estimated cost for any damaging scenario to avoid future implications.
Physical and mental wellbeing benefits of open spaces	More emphasis should be given to the benefits of all open spaces and closed spaces should be open to everyone.
HIA should go further	The HIA and plan should go further to address the major known issues in Oxford.

Statutory Consultee Responses

Oxfordshire County Council

Topic	Summary	Response	Outcome
Evidence Base – HIA Screening Report	Public Health This document provides a useful guide and includes some of the essential criteria for measuring the health of a population, such as life expectancy. However, it also needs to include reference to ‘healthy life expectancy’, which is a crucial indicator of local health inequalities and helps the assessor to uncover potential mitigative action to promote healthier lives and reduced pressure on health services. The document makes reference to Oxfordshire’s HIA toolkit but with no clear link or indication of where the user can access this guidance. Please include a link to the Oxfordshire Leader’s Joint Committee website where appropriate. It is useful that the document signposts the user to the JSNA, however this has now been replaced by the Oxfordshire Data Hub – Welcome to the Oxfordshire Data Hub. There needs to be a reference to this as a key data source, along with others such as Census and ONS.	Noted. Thank you for the update. We will seek to review and ensure that correct references are included.	No Action Required Oxford City Action Consider including reference to OLJC Website and note that the JSNA has been replaced by the Oxfordshire

2807

			Data Hub

Background Papers

All Public Responses

Topic	Summary of Comments
Background Paper 001	• Urges to set a housing requirement above the Standard Methodology • Criticises the lack of reference to the PPG • Prefers option C
Permanent Residential Moorings	• Very few suitable sites for mooring but strong demand • Include better power hook-ups, conservation areas must have no moorings.

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Statutory Consultee Responses

Oxfordshire County Council

Topic	Summary	Response	Outcome
009 BGP Natural Resources	Minerals & Waste Delete reference that states “Work is underway on a new Minerals & Waste Plan which would cover the period to 2042.” It should be included that Oxfordshire County Council are the Waste Planning Authority and responsible for planning for the management and disposal of Wastewater and Sewage sludge (Policy W10)	We can delete this reference to reflect the information on the County website when we update the Background Papers. Will consider which document is best suited to include this information.	Oxford City Action: delete reference from BGP9 Oxford City Action: Consider inclusion of suggested text.
BGP 010 Health and Wellbeing	Public Health The Health and Wellbeing chapter of the Sustainability Appraisal is welcomed. Draft Policy HD10: Health Impact Assessments needs to be specific on the threshold for triggering the need for a developer to conduct an HIA. For example, requiring all developments which include 50 or more residential units, or over	Noted. Already covered in Policy HD10 HIA.	No Action Required

2810

	1,000sq.m if commercial, to do an HIA, as is the case in Birmingham's Local Plan. This helps to remove any ambiguity over whether or not a development requires an HIA and should actually remove some of the extra burden that has been outlined as a potential negative consequence of this approach in the SA. As such, Option A is my preferred approach for this policy, on the basis that formal thresholds are included.		

Evidence Base

All Public Responses

Evidence base	The HBF note that the Council has not included a housing trajectory within the draft regulation 18 local plan, nor could we find one within the evidence base. Given that the NPPF states in paragraph 74 that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period we would expect to see such a trajectory in the submitted local plan. The Council should also provide an annualised trajectory setting out when each site contributing to the city's housing supply will come forward and the rate at which it will deliver. Previously the HEELA provided an indication of supply rates within five-year tranches, however this lacks the detail necessary for effective scrutiny of the deliverability of the submitted plan. Only an annualised trajectory will allow interested parties to effectively scrutinise land supply over the whole plan period and by extension the level of unmet needs arising over the plan period.	A trajectory is included in the Draft Submission Local Plan. It is not realistic for the SHLAA to provide an annual breakdown against sites for those delivering in the later stages of the plan period as there are too many uncertainties.
Evidence base	Hallam considers that the evidence based studies being undertaken to support the preparation of the plan should not be simply restricted geographically to Oxford and be broadened to joint strategic studies with the neighbouring authorities, none more so than to undertake a strategic review of the Oxfordshire Green Belt. Whilst the evidence base includes Oxford Green Belt Additional Site Assessments, this will only serve to clarify the limited and constrained opportunities for the city to accommodate additional housing. A strategic Green Belt review is necessary if the city's	Although an update has been made to the Green Belt assessment following changes to the NPPF, it still broadly follows the methodology developed jointly through the Oxfordshire Growth Board. The City Council cannot make decisions on how neighbouring authorities consider Green Belt within their areas.

	unmet need is to be met whilst promoting sustainable patterns of development.	
Evidence base – Green Belt	Strongly oppose going ahead with this grey belt designation for Cutteslowe park- it is obviously inappropriate - green and	Cutteslowe Park is not being removed from the Green Belt
Assessment of Additional Sites	biodiverse park (including all the sports fields hay meadow and planted trees and the allotments). Do not want to see any of the sites on the list for possible designation as grey belt to go forward in the final plan as this makes them easier in future to release for building. Would be total abdication of responsibility for the biodiversity on these sites by the council and for the experience/well-being of visitors.	designation through the Local Plan process. Grey belt is not a formal designation.

Evidence base – Lye Valley SSSI Hydrogeological Impact Assessment Report	Range of criticisms and detailed comments received in relation to the accompanying Lye Valley Hydrogeological Impact Assessment report including: • The general methodology including in relation to the range and quality of data used to inform the analysis including that it is considered to be incomplete, omitting key data points, relying on flawed assumptions – e.g. study appears to only consider SSSI and not wider LWS/habitats; • The findings and recommendations including that these are not informed by all the relevant considerations (such as climate change, the work of volunteers) or are based on flawed inputs or assumptions (e.g. monitoring years were wetter on average recently and misses drier years in past), or that they differ from or ignore findings from previous studies (e.g. Lamberth); • That the findings and recommended tests do not fully address key factors impacting the Lye Valley (e.g. groundwater protection zones), or that they are ineffective without further actions to tackle issues such as permitted development rights e.g. Article 4 direction needed; • That the report has been formulated on the basis of supporting more development or as a way to excuse previous development being permitted within the	Whilst the Lye Valley study is focused on impacts on the SSSI, as this is afforded the highest level of protection, the findings and analysis help to inform the approach to protecting the wider area including other associated designations and interconnected habitats. The study provides an additional level of analysis and understanding about the hydrogeological functioning of the areas and its key sensitivities which was not available previously. As with any study, there might be additional benefits in longer term monitoring and analysis in helping to expand evidence, however, this is not always practical within existing time constraints and resources. Whilst there may be some disagreement as to the methodologies and conclusions, the study is considered to be a useful piece of additional evidence

	catchment. Report actually appears to support more small developments in the calculated fen catchment; That the findings should not supersede the Lamberth report which should be maintained as important baseline.	supporting the approach to handling applications that might affect the Lye Valley. It supports the ongoing protection of the wider Lye Valley but highlights that 'protection' varies in how it should be undertaken depending on the location and particular impact pathway mechanisms, which should help applicants/decision makers in meeting their responsibilities set out in national and local policy. Where practical, we will seek to explore how these additional comments can be responded to through the accompanying Technical Advice Note.

Statutory Body Responses

Oxfordshire County Council

Topic	Summary	Response	Outcome

Evidence Base – HIA Screening Report	<u>Public Health</u> This document provides a useful guide and includes some of the essential criteria for measuring the health of a population, such as life expectancy. However, it also needs to include reference to ‘healthy life expectancy’, which is a crucial indicator of local health inequalities and helps the assessor to uncover potential mitigative action to promote healthier lives and reduced pressure on health services. The document makes reference to Oxfordshire’s HIA toolkit but with no clear link or indication of where the user can access this guidance. Please include a link to the Oxfordshire Leader’s Joint Committee website where appropriate. It is useful that the document signposts the user to the JSNA, however this has now been replaced by the Oxfordshire Data Hub – Welcome to the Oxfordshire Data Hub. There needs to be a reference to this as a key data source, along with others such as Census and ONS.	Noted. Thank you for the update. We will seek to review and ensure that correct references are included.	No Action Required Oxford City Action Consider including reference to OLJC Website and note that the JSNA has been replaced by the Oxfordshire Data Hub
Topic	Summary	Response	Outcome

Evidence Base – HRA	<u>Landscape and Nature Recovery – Biodiversity</u> It is noted that atmospheric/air pollution has not been identified as a potential impact pathway with Little Wittenham SAC. Further justification for this decision would be requested as it is considered atmospheric pollution could still impact this site and its designated features. The HRA identifies that likely significant effects on Oxford Meadows SAC in the absence of mitigation have not been ruled out. If these impacts cannot be ruled out through Appropriate Assessment then it is recommended that these sites are removed from the Local Plan.	Natural England do not consider this an issue. NE guidance considers for air pollution associated with a plan to have an impact on a designated site, that site needs to be within 200m of a road. The Little Wittenham SAC (designated for Great Crested Newt breeding ponds), is located more than 200m from any likely source of air pollution. JNCC does not consider air quality to be an issue. Noted. A dialogue with NE is on-going. The HRA will be updated to support the forthcoming Reg. 19 consultation.	No Action Required No Action Required

Cherwell District Council

Topic	Summary	Response	Outcome

ELNA	The principle of a county-wide FEMA is supported. The ELNA needs to be updated at paragraph 2.42 in respect of Cherwell's employment land needs, to align with the information found the Cherwell Local Plan 2042 submission documents. The pattern of employees travelling from neighbouring authorities will be exacerbated unless residential development is prioritised in city above providing additional employment floorspace. The ELNA suggests that industrial/warehousing space is accommodated outside the city and refers to locations within Cherwell District. There has been no formal request or agreement for	Support noted. The ELNA has been updated in respect of Cherwell's latest employment land needs position. The city's strategy is to prioritise new sites for housing. However, intensification of existing employment sites is needed in order to meet the city's identified employment needs. The ELNA describes the current situation regarding warehousing, i.e., limited demand within the city as it is not a good location for such uses. There is no request for unmet warehousing need to be taken.	
Topic	Summary	Response	Outcome

	unmet warehousing need. Clarity on this point would be welcomed.		

South Oxfordshire District Council and Vale of White Horse District Council

Topic	Summary	Response	Outcome
ELNA	1.We are concerned that the interim ELNA does not adequately define the city's employment needs, which means effective and informed consultation is impossible. 2.We do not recognise the collaborative Oxfordshire-wide study on the need and supply of logistics (2.17-2.19) and the assertion that past practice is for logistics need to be met outside the city is made without supporting evidence. This has potential to significantly and negatively impact the planning and development within districts. 3.Concur with the definition of Oxford's FEMA being Oxfordshire, but we strongly object to the inappropriate critique of other established local FEMA designations. The study conflates	1. The Interim ELNA did not include the city's employment land needs. This will be available as part of the Reg. 19 evidence. 2.There is no reference to an Oxfordshire-wide study on need and supply of logistics in para 2.17-2.19. 3. A review of existing FEMAs was considered a useful exercise by our ELNA consultants as it provided a useful context	No Further Action.

2819

Topic	Summary	Response	Outcome
	the OGNA and AECOM's ELNA for S&V only and so wrongly suggests AECOM were establishing the FEMA for Oxford or Oxfordshire. 4.Reference to a HMA in para 3.36 is factually incorrect. 5.We note the intention to use 2021 Census data, but this is generally considered to have significant limitations for commuting pattern analysis. It leads to inconsistencies with evidence bases of neighbouring authorities, and this poses a risk to future collaborative planning efforts and could undermine the efficacy of joining strategic approaches across the wider Oxfordshire area if required.	for establishing Oxford city's FEMA. 4. The S&V ELNA considers that the HMA is "the majority of" Oxfordshire (para.4.28) 5. Limitations of the 2021 Census are noted however it does represent the most recent Census data.	

Evidence base - Specialist housing needs assessment	1. It is a significant omission to not include households climbing out of need as part of stage 4 of the methodology, and Table 4.5. 2. The Housing Needs Assessment (HNA) needs to consider the impact of in and out migration. 3. The Housing Need Assessment HNA should provide links within the footnotes to any data used, such as Office for National Statistics (ONS) modelled income estimates and data from the English Housing Survey	1. Table 4.5 shows simply projected housing need arising per annum. Whether existing affordable homes may become available is considered in the supply section. 2. The impacts of in and out migration are considered in the demographic analysis that forms the basis of much of the assessment.	

Topic	Summary	Response	Outcome

	(EHS) or Annual Survey of Hours and Earnings (ASHE). 4. We suggest that the HNA consider using housing benefit eligibility criteria to inform need. The current use of an income multiplier does not take account of different household circumstances and the 35% multiplier currently chosen has no justification. 5. There needs to be a reliable data source for the number of households living in unsuitable housing. 6. Paragraph 4.15 identifies that 'current need is estimated to be 2,446 households'. There should be a description provided about how this figure is arrived at. It also bears no relation to figures in table 4.3, so this should be explained. 7. Table 4.4 estimates current affordable housing need by affordability. There needs to be a reliable data source provided for this estimate. 8. Paragraph 4.19 estimates that 1,160 new households would form annually and two-thirds will be unable to afford market housing, equating to 708 newly forming households of need per annum on average. The assumptions made to inform these figures needs to be explained. 9. Paragraph 4.20 should identify the period considered, and it should provide any	3. Links can become out of date. As long as it is clear what the source is, this should be adequate. 4. Using a percentage of household income to estimate affordability is a common and standard approach. Previous MHCLG guidance has recommended the use of a % of gross household income in assessing affordability and ONS continues to use this approach. 5. Table 4.3 is a collation of different types of unsuitable housing (e.g. overcrowding), compiled by Iceni from the preceding parts of the analysis, which are all sourced individually. 6. The households in unsuitable housing in Table 4.3 is a starting point, but not itself indication of the level of need- there are exclusions of those who are likely to be able to afford market housing and those already in affordable housing. Once excluded, the figure of 2,446 is	

	data that has informed this section, such as the		

Topic	Summary	Response	Outcome
	additions per year to register, if that's what is used. 10. Paragraph 4.22 cites the sources used and the time period to identify supply through relets. As this is not stated for elements of need it's not possible to determine if the time periods align. The choice of a 3-year period should also be justified because the oldest figure of the 3 years has the lowest number of relets, which may inadvertently assume a lower supply. 11. Paragraph 2.45 requires a data source for the 251 homes sold below the lower quartile price. 12. Paragraph 4.33 to 4.34 indicates the need of those who can't afford to rent on the market could be met through affordable rents. However, Policy H2, part b only requires social rents. This requires justification, particularly as the delivery of more social rents impacts viability and the thresholds for the Policy. 13. The analysis on shared ownership, first homes and rent to buy is a simplistic comparison of likely affordability of different products and it should link to data on incomes, savings, and identify the number of households able to afford.	derived. This is clearly explained in paragraph 4.15 7. This 2,446 number is derived as explained in response to point 6. 8. The second element of newly arising need is existing households falling into need. To assess this, information about existing households who have been housed in social/affordable rented sector housing over the last three years has been used to represent the expected annual flow of existing households falling into need. The analysis excludes transfers. 9. Paragraph 4.20 gives annual figures. The plan period is used for all the demographic data behind calculations. The paragraph is clear that information about households entering the social/affordable rented sector has been used to represent the expected flow of households onto the housing register over the plan period.	

		10. Equally, selecting only two years, that avoids the lower year,	

Topic	Summary	Response	Outcome

		could over-estimate supply. Three years is considered a robust enough time period to give a good idea, whilst remaining recent enough to be relevant. It is in line with the PPG, which makes reference to consideration of recent trends. 11. The number is derived using Land Registry data 12. It is not correct that Policy H2 only requires social rents. Part of the tenure split includes intermediate forms of affordable housing. However, it is also the case that social rent is prioritised because it meets the needs of those in greatest housing need. Also, standard affordable rent discounts are not considered affordable in Oxford, so a greater degree of discount would be required for it to be considered affordable housing in Oxford. 13. the analysis is considered fit for purpose.	

General/Other Responses

Topic	Summary	Response
15-minute cities	Support for the 15-minute cities concept – it was not publicised well, but it has worked in other cities.	Noted.
Recreation grounds	These sites are used by residents, football teams and clubs from all ages and all walks of life. To lose these would be at the detriment of the area and locals, especially young people.	The detailed site allocation policies seek reprovion of sports facilities.
Clarity over how housing figures have been reached	There should be greater clarity regarding: - the capacity for housing within the city's administrative boundaries; - why the plan period start date of 2022 has been chosen; - how the housing figures from the existing OLP and the extant Local Plans for neighbouring local authorities relate to the housing requirement over the new plan period; and - the approach to be taken to meeting residual unmet need.	Since the Reg 18 consultation the plan period has been adjusted to 2025 – 2045. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.
More deference to national policy	Re-stating the NPPF's contaminated-land rules, the Environment Act's 10 % biodiversity-net-gain requirement or the Future Homes Standard's net-zero-ready fabric provisions does not enhance protection; it merely piles extra reports onto applicants.	The city has a local net zero target of 2040 and the national requirement is 2050. Many policies are bespoke to ensure we meet this target.

Council tax is too high	The excessive regulation enforced by the Council means Council Tax is too high. People can't afford to buy houses because they are having to subsidise social housing.	This is beyond the remit of Planning.
Transport issues	• Please could you find ways to stop cars and traffic dominating our city? • Please could you make park and ride work? • Please could you stop stationary traffic where queues of drivers try to get into the Westgate Centre? If	The City Council will continue to work with the County Council to identify potential solutions to these issues, with the aim of enhancing public realm. However, the details of this work, and

Topic	Summary	Response

	that continues to be the reality once the Botley Road is open again, it will be very bad. • Please could you find ways for cyclists to be able to use the roads without confronting potholes and drain covers with large gaps around them? • Please could you find a way for cyclists to go east west without having to dismount from their bikes? • Please could you stop buses driving up Queen Street? • Traffic congestion is significantly caused by private school drop-offs. • Proper cycle highways and trams needed to connect the city. • Move the coach station to the Becker street carpark next to the main station to save public transport network and pedestrian accessibility.	implementation of schemes, will be led by the County Council as Highways Authority and are outside the realm of the Local Plan.

Appendix 1 – Statutory Consultees

Appendix 2 – Additional Local Groups and Organisations Contacted Directly

Appendix 3 – Leaflet Sample

Appendix 1: Statutory Consultees and Duty to Cooperate Bodies

Blackbird Leys Parish Council	Canal & River Trust
Cherwell District Council	EE
Environment Agency	Highways England
Historic England	Homes England
Homes England (SW Consultations)	National Grid UK
Natural England	Network Rail
NHS England	NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
Office of Rail and Road	OxLEP Oxfordshire Local Enterprise Partnership
Oxfordshire County Council (Strategic Planning Team)	Thames Valley Police
Thames Water	The Office of the Police and Crime Commissioner for Thames Valley
Active Travel England	Vale of White Horse District Council
South Oxfordshire District Council	West Oxfordshire District Council
Littlemore Parish Council	Risinghurst and Sandhills Parish Council
Old Marston Parish Council	Avison Young (on behalf of National Gas Transmission)
The Coal Authority	Three
Vodafone and 02	The Theatres Trust

Appendix 2: Additional Local Groups and Organisations contacted directly

St Ebbes New Development Residents Association	Advisory Council For the Education of Romany and Other Travellers
Age UK Oxfordshire	Apsley Road Residents Association
Apsley Road Residents Association	Barns Court Allotment Association
Barns Court Allotment Association	Barracks Lane Allotment Association
Bartholomew Road Allotments Association	Bartlemas Close Allotment Association
Barton Community Association	Barton Fields Allotment Association

Binsey Village Residents Association	Blackbird Leys Community Association
BOAT Boaters of Oxford Action Team	Build a Dream Self Build Association
Bullingdon Community Association	Co-ordinating Committee of Headington Residents' Associations (CCOHRA)
Cordrey Green Residents Association	CPRE Oxfordshire
Cripley Meadow Allotment Association	Cunliffe Close Residents Association
Cuttleslowe Allotment Association	Cuttleslowe Community Association
Deaf Direct Oxford	Design Council Cabe
Divinity Road Area Residents Association (DRARA) Planning Action Group	Donnington Residents Association
East Oxford Community Association	East Oxford Residents Association Forum
East Ward Allotment Association	Essex Street Residents Association
Fairacres Road Allotment Association	Fairview Allotment Association
Falcon Close Resident's Association	Feilden Grove Residents Association
Florence Park Community Association	FOXCAN (Friends of Oxford Canal)
Friends of Aristotle Recreation Ground	Friends of Aston's Eyot
Friends of Bury Knowle Park	Friends of Cutteslowe and Sunnymead Park
Friends of Florence Park	Friends of Headington Hill Park
Friends of Holy Trinity Church	Friends of Iffley Fields
Friends Of Iffley Village	Friends of Lye Valley
Friends Of Quarry	Friends of Oxpens Meadow
Friends of Raleigh Park	Friends of South Park
Friends of the Trap Grounds	Friends Of Warneford Meadow
Friends, Families & Travellers Community Base	Gurdwara Sri Guru Singh Sabha Oxford
Harefields and Marriott Residents Association	Harefields Residents Association
Headington Action	Headington And St Clements Residents' Associations
Headington Community Association	Headington Heritage
Headington Neighbourhood Forum	Highfield Residents' Association
Hill Top Road Residents' Association	Hobson Road Group
Hurst Street Residents Association	Iffley Fields Community Nature Plan Group
Iffley Fields Residents Association	Iffley Road Area Residents Association
Iffley History Society	Ingle Close Allotments
Jack Straw's Lane Residents Association	Jericho Community Association
Jericho Wharf Trust	Jeune Street Residents Association
Kestrel Crescent Allotment Association	Littlemore Community Association
Littlemore Local Historical Society	London Place Residents Association
Lower Wolvercote Allotment Association	Marston Ferry and Blackhall Allotment Association
Marston Ferry and Blackhall Allotment Association	Marston Street Residents Association
Middle Cowley Action Group	Mileway Gardens Residents Association
Mill Lane Allotment Association	Moreton Road Residents' Association

Morrell Avenue Area Residents' Association (MAARA)	Morrell Avenue Area Residents' Association (MAARA)
New Headington Residents Association	New Marston South Residents Association
Norham Manor Residents Association	North Oxford Association
North Parade Residents Association	Northway Action Group
Northway Community Association	Northway Tenants and Residents Association
Old Marston Residents Association	Osney Island Residents Association
Osney, St Thomas & New Botley Allotment Association	Oxford and District Federation of Allotment Associations
Oxford and District Federation of Allotment Associations	Oxford Archaeology South
Oxford Asian Cultural Association	Oxford Civic Society
Oxford Cohousing	Oxford Community Land Trust
Oxford Green Belt Network	Oxford Hindu Temple & Community Centre Project
Oxford Historical Society	Oxford Irish Society
Oxford Muslim Community Initiative	Oxford Pegasus Residents Association
Oxford Preservation Trust	Oxford Quakers
Oxford Waterside Residents Association	Oxfordshire Architectural and Historical Society
Oxfordshire Association for the Blind	Oxfordshire Buildings Record
Oxfordshire City and County Archaeological Forum	Oxfordshire Gardens Trust
Oxfordshire Youth Support Services	Park Town Trust
Polstead Road Residents' Association	Ramsey Road Allotment Association
Regal Area Community Association	Residential Boat Owners' Association
Risinghurst Allotment Association	Rose Hill (Lenthall Road) Allotment Association
Rose Hill Community Association	Save Port Meadow
Showman's Guild of Great Britain (London and Home Counties)	Sorrel Road Allotment Association
South Jericho RA	South Oxford Community Association
South Ward Allotment Association	Spragglesea Mead and Deans Ham Allotment Association
St Aldate's Parish Church and Centre	St Clement's Allotment Association
St John Street Area Residents' Association	St John Street Area Residents' Association
St Margaret's Church	St Margaret's Area Society
St Mary's Road Residents Association	Summertown Riverside Group
Summertown St Margaret's Neighbourhood Forum	Templars Square Residents Association
Thames Valley Gypsy and Traveller Association	The Ancient Monuments Society
The Georgian Group	The Gypsy Council

The Oxford Buddha Vihara	The Society for the Protection of Ancient Buildings
The Travellers Movement	The Twentieth Century Society
Thrangu House Oxford	Town Furze Allotment Association
Trap Grounds Allotment Association	Upper Wolvercote Allotment Association
Van Diemens Lane Allotment Association	Victoria Road Group
Waterways Residents Association	West Oxford Community Association
Wingfield Residents	Wolvercote Commoners Committee
Wolvercote Local History Society	Wolvercote Neighbourhood Forum
York Place Residents' Association	

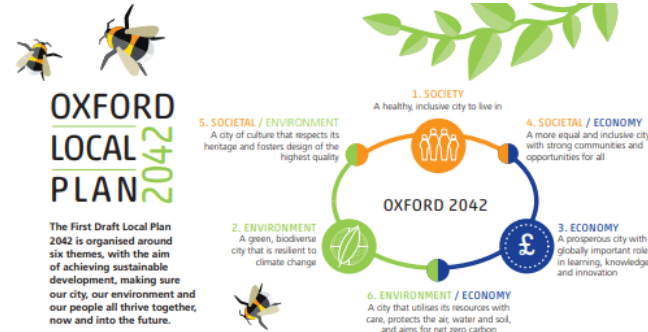
Appendix 3: Leaflet Sample

OXFORD LOCAL PLAN 2042

PLANNING OXFORD'S FUTURE FIRST DRAFT LOCAL PLAN 2042

We would like to hear your views on the First Draft Oxford Local Plan 2042.

The new Local Plan will aim to address the key issues facing all of Oxford's residents and businesses. Based on the existing use of the land in the city, it will outline where and how new housing developments can take place in the future, whilst also ensuring the city's economic growth is managed and made more inclusive for everyone, and preserving the qualities that make Oxford unique.



TAKING CARE OF OUR ENVIRONMENT

We think it is important that Oxford is a green biodiverse city that is resilient to and minimises our impact on climate change. Requiring low carbon and environmentally friendly buildings is something we should do. The quality of our built environment is also key to supporting a high standard of living, so we should promote good design across the whole of the city that respects heritage assets and their surroundings.

In this leaflet we have picked out key parts of the draft. Your responses will help inform the draft Local Plan that we aim to consult on by the end of this year, before we then submit it to the Government to be examined.

THE FULL DRAFT CAN BE VIEWED HERE

www.oxford.gov.uk/localplan2042

TO RESPOND TO THE IN-DEPTH CONSULTATION:

<https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2042-reg18>

TO RESPOND TO THE SHORT CONSULTATION:

<https://consultation.oxford.gov.uk/planning-services/local-plan-2042-reg18-short>

OR BY RETURNING THIS LEAFLET

WHAT IS OUR HOUSING NEED AND WHAT CAN WE DO TO TRY AND MEET IT?

There is a great need for new, affordable homes in Oxford. Our housing need is 1,087 dwellings per year. Oxford is one of the least affordable cities to live in the UK.

- 1** We have used up-to-date evidence of costs and profits in new developments to set an affordable housing requirement- we are proposing that 40% of new developments with more than 10 homes should be affordable, and 80% of those affordable homes should be social rented housing as this is the most affordable type to best meet needs. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

ALLOCATING SITES FOR DEVELOPMENT

We don't have space to meet our full need in the city, certainly not without compromising other needs like open space. But we must still try to deliver as much housing need as possible. Our policies prioritise housing and we have worked hard to identify sites - contacting landowners, running a call for sites and carrying out desk-based exercises. We are also looking at the Green Belt.

We have identified sites that we are investigating to allocate for development. Nearly all of these are on previously developed land. We will continue to talk to landowners and assess impacts for example in terms of access, heritage and green infrastructure. We would welcome comments on key things to consider as we go on to draft the detailed site allocation policies. Maps of the sites can be found online by scanning the QR code.



GREEN BELT

Having unmet housing need means that the Government tells us we have to see if areas of the Green Belt could be developed for housing. At this stage, we have ruled out much of the Green Belt as not being suitable for development, for example because it is functional flood plain or because of its wildlife value. The rest of the Green Belt we have assessed against the purposes of Green Belt, and we now need to investigate landowner interest, biodiversity interest, whether there is access and whether there are any other constraints. Maps that show the area of Green Belt, the areas ruled out and the areas in scope for further investigation are available by scanning this QR code.



Maps showing the sites we're investigating are available on our website. If wish to see them but can't view these please contact us using the details below.

SUPPORTING OXFORD'S SUCCESSFUL ECONOMY AND REDUCING INEQUALITIES

Oxford is a prosperous city, with a globally important role in education, research and health, and education. However, there are inequalities across the city. Reducing these means there needs to be access to employment opportunities for all, as well as access to decent, affordable homes.



- 5** We have identified what we think are key employment sites in the city that we should protect. These are sites that support Oxford's internationally important role in education, research and health, and also those that support a diverse and strong economy. We are not protecting any employment sites in the city centre or district centres, to give full flexibility in those areas, for example to allow for offices to change use to housing. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

- 6** We propose requiring community employment plans so that work and training opportunities are given to local people. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

- 7** Affordable workspace is proposed as a new policy approach- the largest key employment sites will be expected to deliver an affordable workspace strategy, to ensure a range of employment types and businesses. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW



WE WOULD LIKE YOUR VIEWS ABOUT THE OPTIONS WE'RE CONSIDERING FOR THE LOCAL PLAN 2042...

OXFORD LOCAL PLAN 2042



2836

ANY FURTHER COMMENTS?



Scan the QR code to sign up to receive our weekly e-newsletter to stay up-to-date with the latest consultations, news and events from Oxford City Council.



YOUR DETAILS

We will accept anonymous responses, but please let us know your name and contact details. This will mean we can contact you when we next consult on the Local Plan 2042. Your comments will be considered by the Planning Policy team at Oxford City Council.

Your Name:

Organisation (if applicable):

Address:

Email:

Gender: ☐ Female ☐ Male ☐ Prefer not to say

Prefer to self-describe:

Age Group: ☐ Under 16 ☐ 16-19 ☐ 20-24 ☐ 25-34

☐ 35-44 ☐ 45-54 ☐ 55-59 ☐ 60-64 ☐ 65-74

☐ 75+ ☐ prefer not to say

Date:

Do you agree to us using your data to analyse responses?

☐ YES ☐ NO

Do you agree to us using your data to contact you about future engagement events relating to the Local Plan 2042? ☐ YES ☐ NO

DATA PROTECTION Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for Oxford Local Plan 2042 consultations only, and we will only store your data until the Plan is adopted.

PLEASE POST BACK TO US IN AN ENVELOPE MARKED
'FREEPOST Oxford City Council' (no stamp required)

FREEPOST Oxford City Council

OXFORD
LOCAL
PLAN 2042

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