Appendix 7 - Reg. 19 Summary of Responses

Chapter 1

General Comments relating to Chapter 1

POLICY	General comments			
All respondents **supporting** policy	43.5	86.1	98.1	161.01

COMMENT SUMMARY	OFFICER RESPONSE
The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges. The overarching threads of the Plan are acknowledged.	Comments noted.
National Highways has made a comment welcoming aspects of the Plan's Vision, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	General comments				
All respondents **raising objections** on this policy/chapter	30.5	56.4	58.3	59.3	60.3
	69.5	101.1	139.1	157.1	159.1
	159.2				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

The Plan needs to recognise that there are spatial and wellbeing limitations to growth, and that striving for investment and growth in tech and science labs as a 'trickle down' panacea for the City's challenges and ills will end up harming the environmental and heritage characteristics that actually make Oxford an attractive place to live, work and invest. There are reasons why Luton or Swindon do not punch at the same weight as Oxford, and they are not solely due to the University/s and the academic melting pot here. If the Plan does not re-balance and prioritise housing the City's residents and meeting its basic service and well-being requirements over bending over backwards for the University and Science/Tech sectors, the thin thread holding these two parts of the City together will break to the impoverishment and economic detriment of all.	The Plan, and specifically Policy S1, is explicit in its aims to prioritise new homes and support the health and wellbeing of local communities. A modification is proposed in response to West Oxfordshire that also addresses this point, refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
South Oxfordshire and Vale of White Horse District Councils have made a representation relating to the vision and strategy, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Vision for Oxford is generally supported and in particular the support for research and development in the life science and health sectors. However, this is a fairly narrow focus and the Vision for the plan should look to broaden out this to include the expected investment in AI and other innovation areas. The Objectives of the Plan (under “a fair and	The remit of the local plan is to set out policies pertaining to land use, placemaking and spatial development. A broad economic strategy with detailed treatment of specific sectors relevant to the Oxford area would be beyond the scope of the local plan as a development management document.	None

prosperous city with a globally important role in learning, knowledge and innovation" theme) pick this up, but the Vision should set this out in a clearer manner. In addition, there is currently only a cursory mention of enabling businesses to prosper and no mention at all of the strength of the local economy or more direct references to the need for housing to help sustain and encourage further investment.		
The lack of housing supply in Oxford leads to a restricted labour supply to meet the expansion of employment uses and to sustain the foundational economy. A joined-up approach with neighbouring districts to accommodate housing is essential, thus allowing Oxford's key employment areas to focus on maximising the economic benefit they can delivery.	Engagement and joint working with neighbouring districts and statutory bodies has been extensive and ongoing since the previously submitted plan, culminating in the development of statements of common ground.	None.
[T]he concerns raised through these and previous representations relate to the ability of the Local Plan, as drafted, to deliver on the Vision and Plan objectives, particularly in respect to addressing the housing and employment needs of the City – affordable housing being a central element of need that remains unmet and is growing. Lack of affordability undermines economic growth and prosperity and works against the Vision and objectives in respect to healthy and inclusive communities and equal opportunities for access to all basic needs to include homes,	The Plan does extensively identify land for housing development and economic growth as shown through the site allocation policies and various designations of employment sites. Engagement and joint working with neighbouring districts and statutory bodies has been extensive and ongoing since the previously submitted plan, culminating in the development of statements of common ground.	None.

health, employment, nature and community infrastructure. A Plan that does not deliver sufficient homes nor land for employment, whether that be within its own boundaries, or by securing a robust strategy through which needs can be met cross boundary, will not deliver on a Plan Vision that strives to achieve social inclusion and support communities that benefit from equal opportunities including as referenced – opportunities for access to housing. The Vision must be underpinned by clear strategy and policies to deliver growth to match needs – what can be achieved in Oxford and how it will continue to collaborate with neighbouring authorities to deal with unmet needs, particularly housing in a way that works spatially for Oxford to meet the Vision. The Vision is ambitious, however the Plan fails to provide an effective strategy to deliver this.		
The Vision for Oxford does not address two key aspects, namely the important role that the two Universities play in Oxford; and the acute housing need in the City. The Universities and Colleges play a fundamental role in the social, educational, tourism, and local economy of Oxford, and indeed wider Oxfordshire, as is noted in Page 1 (second paragraph), Page 15 (first bullet point) and Chapter 4 (page 1, first paragraph) of the LP45. In addition the Universities and Colleges require a functioning ecosystem. Good schools	The Plan does acknowledge the role of the Universities and Colleges within the City and more widely. Additionally, Policy C4 (Protection, Alteration and Provision of Learning and Non-residential Institutions) specifically seeks to protect and provide provision of learning institutions, including schools. Planning for the provision of schools and ensuring there are adequate school places currently falls under the remit of Oxfordshire County Council.	None.

are part of this and access to schools for children of visiting academics is important. The Local Plan must encourage and support schools to expand and enhance their facilities as needed. These points should be recognised in the Vision. It is noted the NPPF Paragraph 22 encourages Local Plans to have a Vision which looks over a longer term period (at least 30 years). In particular, where larger scale development is proposed and to take account of likely timescales for delivery. Whilst this is not a requirement for this Local Plan given the lack of large scale development proposals, having a longer term Vision for Oxford (which envisages how Oxford's housing and employment needs will be delivered over the longer term) is important given its inability to meet its identified housing need. This longer term, joined up, approach was being taken in the, now abandoned, Oxfordshire 2050 Spatial Strategy and one that the City is encouraged to take in its LP45.	The reference to paragraph 22 of the NPPF is noted but, as mentioned, the 30 year vision is intended to apply to large scale developments such as new settlements, which would not apply to Oxford City. Notwithstanding this the Plan covers the period 2025-2045 which will deliver a long term strategic vision for the City.	
Whilst the LP45 makes reference to there being a "chronic undersupply of housing" (Page 1, third paragraph), the Vision does not acknowledge this (only referring to 'access to housing') or set out any meaningful approach to addressing it. This should be a fundamental element of this Local Plan. Our response to Policy H1 makes reference to the use of the standard method and it providing a minimum figure that can be uplifted in order to recognise	The Vision sets out in broad terms the strategic objectives of the plan as a whole. It covers a wide range of topic areas which are expanded upon in the strategic policies and explored in greater detail in the individual policies of the plan. They are sufficiently descriptive as written and repetition is not considered to be necessary.	None.

additional housing need arising from an uplift in planned economic growth, in calculating the City's housing requirement in the new Local Plan.		
Suggestions made to amend Vision (P 4) to include the words 'and reducing inequalities' and to request more explicit mention of and emphasis on safety.	None of the suggestions are considered necessary to make the plan sound, instead they provide alternative versions of the existing text.	None.
Suggestions made to amend text in Objectives and Strategy table section "A liveable city with strong communities and opportunities for all."	None of the suggestions are considered necessary to make the plan sound, instead they provide alternative versions of the existing text.	None.
The plan does not deliver on the overarching threads. The overall strategy of meeting all identified employment needs arising within the city while exporting its unmet housing needs to greenfield sites in neighbouring districts does not meet the aims of the overarching threads. Reducing inequality - the plan includes a great deal more employment space than housing. Drastically increasing the number of jobs in the city will increase the demand for housing and drive up the cost of housing. Higher housing costs in oxford will increase inequality. Addressing climate change - The jobs housing imbalance will encourage car use, worsen traffic congestion, road safety and pollution. Enabling a liveable city - It will not be possible for most of the employees on the new employment sites to live within a 15 min walk of their workplace. The strategy is not consistent with NPPF, para 111 a) as it fails to support an	The plan does not include allocations for new employment sites, and there are locational restrictions on where employment generating uses will be permitted – as set out in Policy E1. The emphasis of the plan as contained in E1 is on intensification and modernization of existing employment uses, and there are provisions to allow the loss of employment floorspace to housing on meeting set policy criteria.	None.

appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. The plan is not consistent with NPPF, para 8 on sustainable development, which seeks a range of homes to meet the needs of present and future generations. The ratio of the number of jobs created to the number of homes provided must be reduced.		
In their previous/current Local Plan, Oxford City Council designated most development land within Oxford City for employment not housing. They exported their inflated 'unmet' housing need to surrounding district councils and insisted under the 'duty to co-operate' that new houses should be built on the edge of Oxford in the Green Belt. In their 'duty to co-operate' surrounding district councils made provision of housing to meet Oxford's 'unmet' need in the Green Belt all around in Oxford. [The plan] discusses providing homes for all without assessing housing need and failed to use approved Government methodology previously. It now claims that the correct methodology has been used, but the figures are very similar to previous ones and cannot be scrutinised. Development land for employment takes priority and the assessed need is not evidence based and evidence apparently used is not available to the public.	Refer to officer responses to policy H1 representations.	Refer to officer responses to policy H1 representations.

CPRE has carried out research on the previous iteration of the Plan to show that Oxford City Council plans to create over 14,000 new jobs but provide only 714 new homes . It plans to export its deliberately created 'unmet' housing need to surrounding councils as before without any proper evidence or assessment of need.		
Oxford City Council has not solved the problem of how the current commuters can travel into Oxford City to work, yet wants to exacerbate the problem but creating 14,000 additional jobs within Oxford City while exporting more housing outside Oxford for people to fill these jobs. The transport problem, resulting pollution etc. will be greatly exacerbated by this and the County Council's proposed 'Traffic Filter' scheme which offers no alternative public transport or new cycleways for those commuting into Oxford from villages with no or little public transport. It would be preferable to create new jobs outside the City centre. There are still a number of sites for employment that have not been fully developed on the edge of the City, which are more accessible. e.g. Oxford Business Park has been in development for over 20 years and is still not fully developed, yet is not available for housing. The Botley Road should be mixed developments of housing and commercial, but the south side is primarily commercial.	The emerging approach towards employment sites differs from the current plan in a number of ways. The emerging plan limits the development of new employment generating uses through the inclusion of locational criteria, and promotes the intensification and modernisation of existing employment sites. It also makes allowances for the conversion of some categories for employment floordspace into housing use. The process for allocating a site for housing in the plan takes into consideration various factors including the size of the site, the intentions of the landowner, the likelihood for delivery on the site within the timescale of the plan, physical and policy constraints on development (e.g. flood risk, ecological designations), and the number of units that can be realistically delivered on the site. Several sites have been assessed as potential allocations which ultimately did not meet the inclusion criteria.	None.

The environment is identified as one of the six themes underpinning the Council's vision for Oxford in 2045. Figure [1.1] sets out the underlying objectives associated with each of the six themes and there is no mention of Oxford's broader landscape setting. The protection of the characteristic landscape setting of the city essential to its semi-rural identity should feature more prominently within the objectives associated with Oxford's landscape. We recommend these objectives are amended to highlight and reflect the significance of Oxford's wider landscape setting to ensure a sound and consistent approach in relation to the wider policies within the Local Plan.	The themes setting out the vision of the plan are in line with the Council's wider objectives and priorities. They are broad and cover a wide range of topic areas which are expanded upon in the strategic policies and explored in greater detail in the individual policies of the plan. We consider that the objectives are sufficiently descriptive at this point in the plan text.	None.
There are important strategic matters, for which there is no evidence of a shared approach between the local authorities in Oxfordshire. The most pressing of these is housing need. On some more detailed matters – including the conservation and enhancement of important views of the city, the City Council has missed opportunities to work effectively with its neighbours, such as with the Vale of White Horse and South Oxfordshire District Councils. We ask that the Inspector be satisfied that these matters have been effectively considered by all parties within the city and county. In particular, we ask that there is an agreed joint strategy to meet the City and County's housing needs, including the critically important requirement for affordable key worker housing.	Engagement and joint working with neighbouring districts and statutory bodies has been extensive and ongoing since the previously submitted plan, culminating in the development of statements of common ground with several bodies. A key area of joint working has been housing need, however other areas have been covered and these are referenced in various parts of the consultation statement. The agreed statements will form part of the supporting documentation in the local plan submission.	None.

Policy S1

POLICY	S1
All respondents **supporting** policy	30.1

COMMENT SUMMARY	OFFICER RESPONSE
None received.	N/A

POLICY	S1				
All respondents **raising objections** on this policy/chapter	1.1	50.1	57.1	59.1	69.1
	43.1	52.1	58.1	60.1	88.1
	107.2	113.1	118.1	131.2	157.2
	139.2	101.2	133.1	159.3	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Such policies need to wait until a decision is made on Local Government Reorganisation.	The requirement for LPAs to have an up to date local plan is not impacted by Local Government Reorganisation.	None.
Policy S1 replicates the NPPF presumption in favour of sustainable development; however, repetition of national policy should be avoided and the policy should instead relate to the local context.	The West Oxfordshire District Council SoCG for Policy S1, also addresses this issue. Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The transport strategy fails to give sufficient priority to sustainable transport modes as required by NPPF paras 115 and 117.	Criterion d) of Policy S1 is explicit in supporting sustainable transport modes. Sustainable transport is also required in numerous policies	None.

The transport policies should be more forward thinking and consistent with national guidance.	throughout the Plan including Chapter 7 and as part of site-specific allocation policies in Chapter 8.	
This plan does not sufficiently demonstrate exceptional circumstances to justify the imposition of additional housing need on neighbouring councils which will result in further removal of land from the Green Belt.	Policy H1 outlines the housing requirement and unmet housing need. There is an expectation in the NPPF that local authorities collaborate across their boundaries to address unmet housing need. A formal request has been made of our neighbouring authorities for helping meeting unmet need, and the LPA is maintaining effective co-operation. Background Paper 006 (Green Belt Review) sets out the approach to Green Belt in greater detail.	None.
As it stands, the Council's approach fails to properly acknowledge the relationship and interaction between housing and economic growth. Policy S1 is contradictory to Policy E1 The wording " prioritising housing elsewhere" must be excluded from this policy if Policy E1 is to be effective. The Spatial Strategy policy should explain how the Plan will deliver the Vison and Overarching Threads outlined in the early pages of the Plan, as well as how development will be delivered over the Plan period.	The West Oxfordshire District Council SoCG for Policy S1, also addresses this issue. Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Criterion g) in the Vision sets out an absolute – preventing new development in locations where it would have a negative impact on important blue and green infrastructure	Criterion g) relates to the protection of neighbouring amenity. Criterion h) directs new development away from locations where it would have a negative impact on important blue	None.

networks, public open space, and flood plain. There should be a caveat added to say…." unless mitigated".	and green infrastructure networks, public open space, and result in loss of flood plain, also ensuring efficient use of land, helping to maximise opportunities on brownfield sites first. The detailed approach to protecting GI is set out in Policy G1.	
New employment development should be developed with housing to reduce commuting. Prioritising housing elsewhere will cause traffic congestion, pollution and prolonged travel time. This must include Green Belt countryside both within Oxford City and the surrounding districts. Without the duty to co-operate this Plan falls flat with deliberately insufficient provision for housing need ,preferring to increase jobs in the centre of Oxford, without houses nearly for people to walk or cycle to work. It deliberately ignores climate change and will not increase biodiversity and will further deplete nature significantly in the country that is already the most nature depleted in the world. The Plan will deliberately destroy Green Belt countryside both within Oxford City and the surrounding districts and the communities that live in it.	We are unable to meet the full extent of the identified housing need within the city. Whereas, we are able to meet our identified employment land needs, through a strategy of intensification and modernisation of existing employment sites. National planning policy requires us to meet both. We recognise that the current wording of Policy S1 could be regarding the plan's focus on housing delivery. Accordingly, a modification to clarify this has been suggested in the SoCG with West Oxfordshire DC. Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1. Policy H1 establishes the housing requirement and takes a capacity-based approach. There is an expectation in the NPPF that local authorities collaborate across their boundaries to address any unmet housing need. We are in the process of agreeing, with the neighbouring District Councils, how any unmet housing need will be addressed. The LPA is maintaining effective co-operation. Background Paper 006 (Green Belt Review) sets out the approach to Green Belt in greater detail.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

	The plan includes numerous policies specifically relating to biodiversity and climate change in Chapters 4 and 5 respectively.	
The Council is failing to follow its own intentions by failing to include prime brownfield sites such as the Oxford Stadium in the Plan despite knowing that it is available, achievable and deliverable within the Plan period. This failing is further exacerbated and highlighted by the fact that the draft Plan also makes a greenfield allocation at Sandy Lane Recreation Ground, just a short walk from the Stadium site. It is difficult to understand how this Plan would release the Recreation Ground for development ahead of the Stadium site. This is a prime example of how the proposed strategy is both severely lacking in ambition and is not consistent with national policy.	The Oxford Stadium is not an allocated site because since May 2022 (and after the site was previously allocated in the Local Plan 2036) the site is operating as a greyhound/racing/speedway stadium so community uses would need to cease operations if the site were to be redeveloped.	None.
Network Rail has made a representation relating to Policy S1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
South Oxfordshire and Vale of White Horse District Councils have made a representation relating to Policy S1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

West Oxfordshire has made a representation relating to Policy S1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
We support this policy in principle but we would like to see this policy specify the Council's stance in favour of applications for the change of use from commercial to residential within city and district centres, referenced elsewhere within the Local Plan (Policy C2: Maintaining Vibrant Centres). Promoting development of this type would achieve a number of the aims as well as helping to meet Oxford's unmet housing need. We would also support a policy sanctioning vacant units, both residential and commercial, within city and district centres. The repopulation of urban centres will have a significant impact on housing need, preventing the further development of Oxford's green setting.	The plan already addresses this point in Policies E1 and C2 so it's not considered necessary to amend S1 as suggested. A policy sanctioning vacant units would fall outside of the remit of planning. The City Council already endeavours to address this issue through the work of the of its Economic Development, Regeneration and Housing teams.	None.
Policy S1 (Spatial Strategy) should set out a spatial strategy which: - Meets the vision and objectives of the Local Plan - Refers to the need to maximise housing delivery in Oxford - Sets out how proposed development is to be delivered over the plan period and beyond; and	The plan's strategy seeks to be the articulation (through policy) of the plan's Vision. Policy S1 is therefore an overarching strategic policy for the city. The Oxford Local Plan 2045 includes policies which provide details of the housing target being planned for. The evidence base studies including the SHLAA and SA include a robust methodology to demonstrate the city's capacity and document	A modification to Policy S1 has been proposed to address issues raised by other respondents, which also relates to some of the issues raised.

- Follows the approach in the extant Local Plan, i.e. maximising growth in the City, including the Areas of Focus, and then adopt a hub and spokes approach, with the City being the focus for education, tourism and employment but having good infrastructure links into the surrounding Districts where housing is more readily deliverable.	how the plan's strategy was arrived at, and why it is appropriate. The City Council has fulfilled its obligations in maintaining effective cooperation (formerly Duty to Cooperate) through regular discussions with adjacent Local Planning Authorities. This work has all been documented within signed Statements of Common Ground. Policy S1 sets a locational strategy which meets the vision and objectives of the Local Plan 2045. The other policies in the Plan have been drafted to deliver the thematic objectives and align with Policy S1. There is also no need to refer to the need to "maximise housing delivery", when the plan's locational strategy is to focus on housing by supporting its delivery across the city and only allocating new sites housing. There is no need to set out how proposed development is delivered beyond the end of the plan period. Other policies in the plan are more area specific (e.g., Areas of Focus, and site allocations). Oxford City Council LPA has no administrative jurisdiction beyond the administrative boundary of the city. The IDP provides a suite of infrastructure projects needed to support the delivery of the Plan and has been produced in consultation with key infrastructure providers.	

	The spatial strategy is sound.	

Policy S2

POLICY	S2				
All respondents **supporting** policy	30.2	43.2	81.1	157.16	159.18

COMMENT SUMMARY	OFFICER RESPONSE
As set out in the Statement of Common Ground, Historic England support reference to the role of heritage in the Council's strategic approach to high quality design.	Support noted and welcomed.
Christ Church supports high quality design in the City. This should be proportionate to the location and setting of the proposed development, and also viability considerations. The Design Checklist at Appendix 1.1 sets out criteria from relevant policies. Should any policies change during the Examination then the checklist will be updated accordingly.	Comments noted.

POLICY	S2			
All respondents **raising objections** on this policy/chapter	1.2	69.2	120.4	139.3

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Time and money wasted by an authority, which will not exist after local government reorganisation.	When a new authority is vested, there will be a period of time before spatial plans for the area within the new administrative boundaries can	None.

	be developed. However this will require collating a new evidence base that is up to date and relevant, with the overall process potentially taking several years. Adopted plans will continue to apply to the geographic area until a spatial plan for the new authority area is developed, and this will ensure that there will continue to be an up to date framework for key policies to be delivered in a way that is as locally relevant as possible without having to revert to national policy only.	
The local housing need is not served by the design code nor is reducing carbon emissions to reduce climate change.	Local authorities are required to set out clear expectations and visions for design, in line with the principles for achieving well designed places contained in the NPPF. The local plan includes specific policies that address housing need and adaptations to climate change, and is to be taken as a holistic document that does not apply individual policies in isolation.	None.
It is questioned whether the checklist needs to form part of the Local Plan itself, and whether it would be more user friendly as a standalone guidance document to support the Local Plan. If the checklist is to remain in the Local Plan, it is necessary that any amendments to draft policy wording is also updated in the Appendix for consistency.	The checklist sets out the criteria by which applications are assessed, and their inclusion in the plan ensures their statutory weight. Where required guidance documents that go into more detail about the application of specific policies may be produced, although they are supporting documents to the plan and will not have statutory weight in of themselves.	None.
The policy and the supporting text should include definitions of what is meant by 'high quality design' and, in particular, 'high quality architecture'. It should also refer to the city's wider green setting and highlight the	The policy sets out the considerations and principles that form the strategic approach to design of the plan as a whole. It encourages a holistic reading of the plan which comprises of individual policies that address the natural	None.

importance of the historic views both from looking out of the city but also looking in (as highlighted in the Assessment of the Oxford Views Cones 2015).	environment, the green setting, important views and high-quality design. Specific definitions and criteria will be expanded in each policy and would not require repeating in detail here.	

Policy S3

POLICY	S3		
All respondents **supporting** policy	43.3	118.2	157.17

COMMENT SUMMARY	OFFICER RESPONSE
No comment	Support noted
West Oxfordshire District Council has made a representation relating to Policy S3, which is summarised in the Statement of Common Ground.	Support noted.
We support necessary infrastructure to address the impacts of any development but delivered on an appropriately phased timescale which will be development specific.	Support noted

POLICY	S3				
All respondents **raising objections** on this policy/chapter	30.3	47.2	51.1	52.2	58.2
	60.2	69.3	88.2	89.XX	138.5
	159.19				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Suggest the following wording is added to paragraph 3 on p16: *The expectation will be that the necessary infrastructure will be completed before occupancy of the site for the purpose for which permission is given.*	We consider that the wording of para. 3 of Policy S3 (n page 13, (rather than page 16, as suggested by the respondent), is appropriate and enables critical infrastructure (as defined in chapter 8 of the IDP), to be delivered in a reasonable timeframe. The Infrastructure Delivery Schedule categorises each infrastructure project into one of four	None.

The reason is that too often the infrastructure to accompany development is not built in a timely manner or in some cases at all.	categories. This paragraph only relates to critical infrastructure, of which there are a limited number of schemes identified in the IDP.	
Dependence on Cowley Branch Line (CBL) and Oxford Railway Station upgrades could affect soundness. This is because the plan identifies Oxford Railway Station and the CBL schemes as transformational infrastructure, with an expectation that certain sites will contribute towards their delivery. The Plan also sets out that development proposals "which rely on the delivery of critical infrastructure projects" will only be permitted prior to completion where the Council is content that the infrastructure "will be in place within a reasonable timetable". Given that both CBL and some station works depend on external funding and decisions, this creates a potential soundness risk under NPPF's tests of effectiveness and deliverability. This is because the plan relies on infrastructure it does not control. As such Policy S3 could be used to delay, what otherwise would be sustainable development if the Council is not satisfied abut timing. This causes a potential tension with the presumption in favour of sustainable development and with the NPPF emphasis on flexibility where infrastructure phasing is uncertain. The term "reasonable timetable" is undefined. This creates uncertainty and a possible internal	Infrastructure projects are usually grouped into one of three categories, critical, essential and important. The Infrastructure Delivery Schedule included in the Infrastructure Delivery Plan (IDP) assigns the majority of infrastructure schemes to one of these categories. In Oxford, there are a handful of infrastructure projects, the delivery of which, would bring significant additional social, environmental or economic benefits in addition to the mitigation or wider benefits delivered by the traditional infrastructure categories. These projects have been categorised into a fourth infrastructure category in the IDP, that of transformational infrastructure. Both the re-opening of the Cowley Branch Line to passenger services, and the improvements to Oxford Railway Station, are in the "transformational infrastructure" category. The plan relies on a variety of third-party infrastructure providers to deliver the infrastructure needed to support the plan, Infrastructure providers include (but are not limited to), Oxfordshire County Council, Thames Water, SSE and others such as Network Rail and the East West Rail Company. Each organisation has its own plans and timeframes within which, infrastructure is to be delivered to support	None.

conflict with S1's statement that "applications that accord with the Local Plan will be approved without delay".	development. We do not consider that Policy S3 would be used to delay development. We do not consider that the phrase "reasonable timetable" creates uncertainty, as this relates to the delivery of critical infrastructure schemes only that identified within the IDP. As	
Policy S3 asks for contributions to the Cowley Branch Line project for locations within the 1500m buffer of which BMW MINI Plant is included. While Policy CBLAOF refers to "figures 8.5 and 8.6" these figures were not presented in the current proposed submission document. Due to off-peak shift arrangements, and because many employees live far from the MINI Plant due to the lack of affordable housing supply, employees are highly unlikely to use or rely on the Cowley Branch Line for transport. Unclear from policy whether the contributions towards the Cowley Branch Line will be additional to those derived from CIL, and what constitutes "trip-generating development".	There is an expectation that development sites within the buffer zone, and generate additional trips, should contribute to the Cowley Branch Line, however, the specifics of this will need to be determined at application stage when considering the merits of each individual case. Re: Policy CBLAOF: Figures 8.5 and 8.6 have been omitted in error and will be reinstated.	None.
Policy does not adequately demonstrate that the infrastructure required to support new housing will be delivered in a timely manner. Without clear infrastructure commitments, development risks placing unsustainable pressure on existing communities. Local infrastructure constraints include: - traffic congestion	The Infrastructure Delivery Plan (IDP) provides a comprehensive review of infrastructure schemes to support the Oxford Local Plan 2045. Discussions with relevant providers have taken place throughout the production of the Local Plan. Thames Water is responsible for water provision/wastewater treatment. Oxford City	None

- limited public transport capacity, particularly in rural communities on the outer edge of Oxford - pressure on schools and health & social care services - wastewater network capacity Re: wastewater, Thames Water report on their website that they are 'finalising plans for a major upgrade at Oxford STW, costing more than £435m... We plan to complete this work in early 2032.' It is our understanding that the funding for all of this work has not been secured and there is a very real risk that development will occur without the essential upgrades to protect our rivers and public health. We would like to see: - A clearer infrastructure delivery plan linked to housing phasing. - Development to be contingent on infrastructure delivery rather than assumed.	Council has been in discussions with Thames Water in relation to the amount of growth proposed in the city's Local Plan 2045 and this growth has been factored into the required wastewater treatment upgrades. Oxford's growth has also been considered in relation to water supply in the SWOX area in the Water Cycle Study and the level of growth proposed in the city can be accommodated by Thames Water. Oxfordshire County Council (as highways authority) is responsible for the local road network. The administrative jurisdiction of the Oxford Local Plan only extends as far as the city's boundary. Following on-going discussions with the County Council in their role relating to education, there are no current capacity issues at schools in the city other than those identified in the IDP.	
South Oxfordshire District Council has made a representation relating to Policy S3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Vale of White Horse District Council has made a representation relating to Policy S3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Network Rail has made a representation relating to Policy S3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy S3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The policy is ineffective as the largest developers and infrastructure developers are the Universities, Oxford University Hospital Trust (Churchill, John Radcliffe, Nuffield, Old Road Campus (part), laboratories etc. who pay very little or no CIL contributions due to their charitable status – no effort to alter the CIL tariffs to match the unique mix of Oxford has been undertaken. A statement of intent is not a policy just a fluffy wishlist.	Developer contributions are not just limited to CIL. Section 106/Section 278 contributions also play an important role in delivering much needed infrastructure in the city. The policy sets out the framework for seeking developer contributions towards known infrastructure projects (as set out in the Infrastructure Delivery Plan). It provides the mechanisms for delivery as well as setting out appropriate delivery timeframes.	None.
Request policy wording is clarified to ensure that once the CBL (and public transport enhancements in defined 1,500m buffer zone) are delivered, no further financial contributions will be sought.	All developer contributions need to meet the required tests set out in both policy and legislation. Once infrastructure schemes have been implemented and the costs have been covered, we will not then be seeking further contributions for those schemes.	None.

Policy S4

POLICY	S4
All respondents **supporting** policy	30.4 | 106.3

COMMENT SUMMARY	OFFICER RESPONSE
We welcome the inclusion of draft policy S4 which acknowledges the need for pragmatism in decision making where development of a site is not financially viable. This is particularly pertinent for sites such as the Centre's campus sites on Marston Road which are longstanding allocations. The introduction of additional requirements on sites which have longstanding viability challenges is likely to hinder their development. Clearly it is a poor outcome for sustainable development for well-located sites to remain dormant. Inclusion of the policy is critical to the Local Plan being found sound.	Support is welcomed
Policy is sound, no reason specified	Support is welcomed

POLICY	S4				
All respondents **raising objections** on this policy/chapter	43.4	47.3	56.3	69.4	86.2
	89.2	107.3	112.2	114.2	130.1
	133.6	134.1	138.6	157.3	159.4

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

Oxfordshire County Council has made a representation relating to Policy S4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Linked to comments on C8 Motor Vehicle Design Standards, while sustainable development should encourage less car journeys, the framing of the policy as blanket restrictions will undermine viability (as recognised in S4) and will have negative impacts which outweigh the potential policy benefits	The Viability Assessment includes consideration of the impact on viability of limiting parking provision in new developments, and this has informed the policy requirements.	None.
Conflict between net zero carbon targets and affordable housing viability. Step 1 & 2 of the cascade allow for the reduction of energy offsetting payments and adjustments to parking requirements, but the policy also requires development to remain free of fossil fuel use.	Policy R1 allows for energy offsetting where applicants are unable to match their operational energy demand through sufficient provision of renewable energy generation. This is to be explored only as a last resort once onsite and offsite options (i.e. on land elsewhere in the applicant's control) have been exhausted. It is a separate element to the policy which also requires that fossil fuels are not being directly utilised in the development to meet energy demands (i.e. no gas used for heating and cooking). Maintaining the requirement of no fossil fuels being directly used in the building will as a minimum help to ensure it is net zero carbon ready at least (i.e. as the wider energy grid continues to decarbonise over time).	None.
SPS8 [Land at Meadow Lane] is an example of a site that is not viable to develop without	Policy S4 sets out a cascade to ensure that policy requirements do not undermine deliverability of sites.	None.

offending sustainability and heritage policies. It should be deleted.		
This policy has considered viability only in terms of cost and profitability for the developer. Viability must also include other aspects of any development such as flooding, climate change and much wider aspects of the Plan itself. When considering viability of a development inflation both in materials and market price must be fully considered. There should be more thorough and in-depth scrutiny of the financial viability of the development in the first place and greater provision for increases in cost, reduction in market price etc. There should also be much greater scrutiny in major external factors that affect the viability of a development - flooding - this was not properly considered in the Barton Park development and has caused increased flooding in the neighbouring housing estate. Sewage - another issue affecting viability.	The Viability assessment for LP2045 applies sensitivity tests to the assumed costs, to account for estimated inflation in costs, sales values and other inputs during the plan period, to explore viability of sites both in today's terms and also future. Policy S4 is about the financial implications of policy requirements, but other impacts of development such as flood risk and climate changes, or infrastructure requirements such as waste water treatment, are covered in policies elsewhere in the plan, such as G7 Flood Risk and Flood Risk Assessments, and G9 Resilient Design and Construction.	None.
Agree that developers are expected to have considered the financial implications of policy requirements, including affordable housing and net zero carbon, and local market indicators, when purchasing the land for development. However the cumulative policy cost has not been sufficiently considered and creates unfavourable conditions for future investment in the City.	The policy requirements in LP2045 have been informed by the Viability Assessment and the cumulative impacts have also been tested for policies which may have cost implications. The Viability Assessment therefore complies with the requirement in national guidance for a comprehensive assessment of all relevant plan policies. The assessment also includes sensitivity analyses to consider growth and downside scenarios in sales values, as well as costs inflation, to help understand the	None.

Concerned that the cumulative impact of the proposed policy requirements will undermine development viability (for new developments and refurbishments) and add uncertainty to the process. This concern is amplified by the recent increases to the Community Infrastructure Levy (CIL) tariff for R&D uses, which further erode viability headroom at a time when development costs are already elevated. The Local Plan should not put in place policies that fetter development opportunities from being brought forward or that mean those tasked with major development investment decisions must operate at the margins of viability. Rapid economic changes such as the recent pandemic, conflicts in Ukraine, Iran, and the wider Middle East and increases in interest rates can have a significant, volatile and long-lasting market impact. It is important that the viability of the development plan is therefore resilient, and that the viability work supports this. sector specific challenges, including general funding and limitations in Government grants, provide further challenges on the life science and technology sectors. It is important that the viability of the development plan is therefore resilient, and that the viability work supports this. Proposed employment uses would be materially affected by the cumulative cost of proposed	implications of policy requirements both in today's terms and also in the future (section 4 of the Assessment). The Assessment tests the ability of developments to accommodation the emerging policy requirements of LP2045 alongside prevailing rates of CIL, so it takes into account the increased rates (following the Partial Review) in the viability modelling. Overall the inputs and assumptions applied in the modelling are robust and reasonable.	

policies. This is in addition to amendments to the City's CIL Charging Schedule adopted in mid-August – which resulted in a fivefold increase for R&D uses from £33.74 psm to £172.28 psm. Those increased costs will ultimately be reflected in rents charged to occupiers. Increasing the cost of occupation for these companies, on top of tax rises including National Insurance and Business Rates, will reduce the funding available for their research and development activities and risks driving many away from Oxford to more competitive locations both within the UK and abroad. That would have a profound and potentially irreversible impact on Oxford's position as a leading centre for innovation. Welcome the mechanism in Policy S4 for net zero and/or affordable housing contributions to be reduced or removed entirely from employment-generating uses via a viability cascade, this very process adds further cost and uncertainty to the planning process. Request that the viability assessment prepared by BNP Paribas is robustly reviewed and the Council robustly considers the cumulative policy cost to ensure Oxford remains a favourable and attractive place to invest, without operating in the margins of viability.		
On a brownfield site like the Oxford Stadium, it is likely that viability will be an issue that affects any future planning application, and viability	The policy requirements in LP2045 have been informed by the Viability Assessment and the cumulative impacts have also been tested. The	None.

assessments will need to be undertaken under S4. This approach may discourage investment in the city as it would place a burden on applicants early in the application process. The requirement to "front load" viability work will add a significant amount of financial cost and uncertainty. If schemes do proceed, then a final position on where the City Council will land will only be after significant up front cost on the application, and land agreements as well as adding further cost to this process in the preparation of the viability assessment and in paying for the Council's assessor to review the submitted information. The effect will be an even higher development cost and greater impact on what can be delivered. The viability process will slow up the decision making process and delivery of development contrary to the overall aim of the NPPF to speed up delivery. Overall, the approach is inconsistent with Paragraph 35 of the NPPF "Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure... Such policies should not undermine the deliverability of the plan."	requirements, particularly for affordable housing contributions, are based on a 'maximum reasonable proportion' basis, to maximise community benefits without undermining the plan and accepting that this will not be universally achievable on all developments. The assessment was informed by a range of likely development and site typologies, based on real examples of recent developments across Oxford, with multiple brownfield site scenarios – to reflect that the majority of sites in Oxford are brownfield. The inputs and assumptions applied in the modelling are robust and reasonable.	
House builders are facing increasingly challenging market conditions with the costs of materials and labour increasingly rapidly, the Building Safety Levy, Biodiversity Net Gains and	The Viability Assessment uses proportionate and reasonable assumptions for the appropriate level of assessment to support a local plan. The build costs from the RICS	None

Land Fill Tax increasing the regulatory burden and higher standard required by building regulations all adding to the burden even before local plan policies are taken into account. Welcome the inclusion of policies in local plans that provide decision makers with the flexibility to consider the viability of development. However, if, as is stated in the opening paragraph of S4, it is to be assumed that development that complies with the policies in this local plan are viable then the full costs of the national and local policies within the local plan must be accurate. Concerned that not all the costs facing house builders have either been included or accurately assessed in the Council's Viability Assessment: - No allowance appears to have been made for the Building Safety Levy. For Oxford this will place an additional £23.62 per sqm on Previously Development land (PDL) and £47.24 per sqm on non-PDL1 which will need to be included in the VA. - The cost relating to BNG are based on the DEFRA Impact Assessment from 2019. The 0.7 % cost increase used is based on the Central Estimate where 25% is delivered offsite at a cost of £11,000 per biodiversity unit. This is considerably lower than the costs being experienced by the development	Building Cost Information Service (BCIS). The local circumstances adjustment is applied to reflect the Oxford context (most development types an extra 10-15% costs has been added into the modelling), and furthermore in response to feedback from stakeholders, the 'upper quartile costs' have been applied on developments in the City Centre, where proximity to heritage assets and conservation areas requires the use of high quality materials.	

	industry. The latest pricing report by Biodiversity UK from February 20262 indicates costs range from £25,000 to £30,000 per unit for the medium distinctiveness habitats with higher distinctiveness habits costs in excess of £50,000. Therefore, where there is a need to deliver more BNG offsite the cost assumed in the VA will be significantly lower than would be experienced by a developer. The cost of BNG will vary significantly from site to site. For example, an urban site may be defined as open mosaic habitat that is difficult to recreate on site and could require 100% offsite delivery at over £50,000 per biodiversity unit. Therefore, it is essential that there is significant headroom in all development to ensure that BNG requirements will not be a barrier to development in future. It ii also noted that BNG and Urban Greening Factor have been costed together. The Council will need to provide justification for this approach. - The combined impacts of Policies R1 and R2 are a concern, and the costs relating to policies R1 and R2 to have been under estimated. The Viability Appraisal estimates that the reduction in residual land values is typically 8% for operational Net Zero Carbon, whilst		

	achieving both embodied and operational Net Zero Carbon would reduce residual land values by approximately 23–43%. These figures represent a substantial viability burden, especially for research and development (R&D) schemes, which typically face higher construction costs and tighter operational performance specifications. The cost of achieving net zero is likely to be higher. Work undertaken by the Future Homes Hub and published in 'Ready for Zero' indicates that the costs of achieving space heating standards being proposed by the Council are likely to be 15% to 19% above those of current building regulations. These costs are based on detailed assessment made by house builders as to what it will cost and as such should be given significant weight when compared to the broad assumptions used in the Council's evidence. An additional uplift of has then been given for achieving net zero embodied carbon meaning the cost included is 15% for both R1 and R2. However, based on evidence from the Future Homes Hub this is likely to only address R1 at best and an additional uplift will be required to address costs relating to policy R2.		

The policy is not effective as the viability evidence supporting the local plan does not reflect the cost of developing new homes in Oxford. Must be amended to reflect the higher costs facing development compared to the assumptions made in the VS.		
There is a lack of alignment between this position and the conclusions of the Viability Appraisal. The Appraisal acknowledges that the cumulative impact on viability is hugely variable, and that it would be difficult to set a suite of policies that are viable for all potential developments coming forward without reducing them to a 'lowest common denominator', so instead opts for ambitious targets which may not be fully achieved in all cases to optimise delivery of policy objectives, although this inevitably comes with the downside of a higher volume of site-specific viability testing at the development management stage. This contradicts the assertion in Policy S4 that compliance with the full policy suite should generally be assumed to be viable. The Council's own evidence indicates that viability outcomes will vary significantly between schemes and that a greater reliance on site-specific viability assessments is anticipated. There is a significant strategic risk that imposing an excessive viability burden on R&D development could constrain future investment in Oxford's knowledge-based economy. This	A high reliance on site-specific viability assessments at planning application stage is not desirable for either the Council nor applicants nor communities. As such there is always a careful balance between optimising delivery of policy objectives whilst setting the policy 'asks' at a level which the majority of site typologies expected during the plan period would be able to deliver. The extensive modelling tables in the appendix to the Viability Assessment help to illustrate the tipping points, but this is not an exact science to be able to identify the exact levels of contributions which should be sought. The levels of contributions sought are reasonable and based on the evidence base. Then Policy S4 complements these policies to ensure flexibility in the event that a site cannot viably delivery the policy requirements.	None.

outcome would run counter to the ambitions of the UK's Modern Industrial Strategy (2025), which identifies science, innovation, and high-value R&D as central to national economic growth and international competitiveness. Ensuring that Oxford remains an attractive location for R&D investment is therefore critical not only for the city's economic success but also for meeting wider national priorities.		
The LP45 has set out an ambitious set of policies that if combined will lead to developers increasingly needing to engage with the City Council and undertake viability assessments under Policy S4. This will dissuade investment in the City as it is not until late in the planning application process that any certainty will be gained on where the viability of a scheme will land (as per paragraph 59 of the NPPF). This applies more to sites that have already been purchased than new proposals that can take account of the requirements and decide whether to proceed or not. The City needs to balance ambitious policies whilst also making the City an attractive location to invest. If schemes do proceed, then a final position on where the City Council will land will only be after significant up-front cost on the application, and land agreements as well as adding further cost to this process in the preparation of the viability assessment and in paying for the Council's assessor to review the submitted information.	The policies in LP2045 seek to maximise community benefits by setting ambitious targets, which the maximum reasonable proportion of sites should be able to viably deliver. This means there is an assumption that a reasonable proportion of sites can proceed on a policy-compliant basis, and would not be subject to site-specific viability negotiations (or the uncertainty or delays to decisions referred to in the comments). It is best practice to discuss key issues (which for some sites would include viability) at the earliest stage, and the NPPF also encourages pre-app discussion. As such this does not need to be re-stated in policy.	None

The effect will be an even higher development cost and greater impact on what can be delivered. It will also slow up the decision-making process and delivery of development contrary to the overall aim of the NPPF to speed up delivery. Policy S4 process should be undertaken at the pre-application stage at a high level and then refined once a planning application has been submitted. The overall ambition of policies in the plan should be re-assessed to encourage development to take place and ensure that paragraph 35 of the NPPF is met, namely that the policies as a whole do not undermine the deliverability of the plan – as is alluded to in the Viability Assessment. Amend Policy S4 to include the ability to undertake a high-level viability assessment at the pre-application stage and then refine it once an application is submitted.		
There are various emerging policies in the Plan which when combined, or indeed in some instances applied in isolation, do not support deliverable urban development and redevelopment. It cannot be said at this stage, that if all policies are complied with in the emerging Plan, this would result in deliverable development for the City.	The policy requirements in LP2045 have been informed by the Viability Assessment and the cumulative impacts have also been tested.	None.

This is unjustified as the overall goal must be to increase the number of houses, it is extraordinary that to maintain viability, car provision, and consequent loss of space for housing, is increased first and then affordable housing provision, which is nonsensical as car provision consumes, for example, one driveway and a potential downstairs room. It is clearly better to have 10 homes with two affordable, than 6 houses, 3 affordable, with space wasted for parking and car infrastructure. This is ineffective as there is no definition of viability, which would be considerably more than breakeven for a developer to proceed with the development.	Policy S4 seeks to prioritise delivery of affordable housing over and above other policy requirements, because of the significant unaffordability of homes to many people in Oxford. So the intention of the cascade approach is that if a site is not viable to deliver the full contributions, that other elements be adjusted in the first instance, only compromising on affordable housing delivery as a last resort.	None.
Concerned that the plan introduces an ambitious set of policies that, if confirmed, will lead to developers increasingly needing to engage with the Council and undertake viability assessments under Policy S4. The following modifications/ changes are sought: - The overall ambition of policies in the plan should be re-assessed to encourage development to take place and ensure that paragraph 35 of the NPPF is met, namely that the policies as a whole do not undermine the deliverability of the plan – as is alluded to in the Viability Assessment. Amend Policy S4 to include the following text:	The policies in the plan have been appraised and tested in the Viability Study. There is no need to "re-appraise the policies". Policy S4 includes a viability cascade which is aligned with the Council's priorities. The policies in the plan do not undermine its viability. We see no need to introduce a requirement for a high-level viability assessment to be undertaken at the pre-app stage. The Plan is sound and is underpinned by credible and defensible viability evidence.	None.

To include the ability to undertake a high-level viability assessment at the pre-application stage and then refine it once an application is submitted.		

Chapter 2

General comments relating to Chapter 2

POLICY	General comments
All respondents **supporting** policy	43.6

COMMENT SUMMARY	OFFICER RESPONSE
No comment added.	Support welcomed.

POLICY	General comments		
All respondents **raising objections** on this policy/chapter	2.1	58.6	60.6

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Chapter 2: I do not see any reference to Oxford as a City of Sanctuary. How do you intend to incorporate this commitment into your plan? All the measures in the plan need to be evaluated against the intention to make Oxford a City of Sanctuary.	Being a Local Authority of Sanctuary means that the Council has made a formal commitment to support all vulnerable individuals, particularly those fleeing conflict or persecution. This has its own separate action plan developed by the Council, which is different to the Local Plan which guides decisions about planning applications.	None

Vale of White Horse District Council has made a representation relating to Chapter 2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
South Oxfordshire District Council has made a representation relating to Chapter 2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy H1

POLICY	H1				
All respondents **supporting** policy	58.4	60.4	98.2	120.1	130.2

COMMENT SUMMARY	OFFICER RESPONSE
The emphasis on additional housing is appropriate to meet the affordable housing need in Oxford.	The support is welcomed.

POLICY	H1				
All respondents **raising objections** on this policy/chapter	47.4	52.3	59.4	67.1	69.6
	84.1	92.1	107.4	113.3	112.3
	89.3	101.3	118.3	120.1	131.3
	133.2	136.1	139.4	157.4	94.1
	159.5	138.7			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxfordshire County Council has made a representation relating to Policy H1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Cherwell District Council has made a representation relating to Policy H1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
West Oxfordshire District Council has made a representation relating to Policy H1, which is	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

summarised and responded to in the Statement of Common Ground.		
The estimated capacity fails to account for house extensions and subdivisions that occur in their 1000s ever year, adding bedrooms and increasing capacity. Oxford does not record development made under PD rights, so the substantial contribution made to housing need of conversions from 2-3 bedrooms is not recorded. The contribution of sites with less than 10 houses should be included. The PPG says sites of 5 units or more should be included, but the City Council only includes 10 or more.	Additions of bedrooms are not additions of housing units. Overall housing need is calculated and expressed in terms of the need for new housing units. The contribution of sites with less than 10 homes is not overlooked. There is a small sites windfall calculation to ensure an assumption about likely delivery of small sites is included in the capacity. Generally, small sites come forward quickly and often more spontaneously than larger sites, and there is a far broader range of landowners with different likely prompts to delivery, so many small sites that will deliver of the plan period to 2045 will not at this point be possible to identify. This applies to sites of 5-9 units, as well as up to 5 units. In the case of Oxford, a windfall figure for sites up to 10 is considered the best way to reflect true capacity.	None.
The Oxford housing market area extends well beyond the city boundaries. It is therefore not justified to destroy the small remaining pockets of green space.	A balance must be struck between protecting the important features and characteristics of Oxford and making the most efficient use of land within the city in order to meet needs within the city as far as possible first, before exporting them. A 'no stone left unturned' approach has been followed in identifying housing sites, but this is balanced against a need to consider whether sites are deliverable whilst being able to mitigate or compensate for any	None.

	harms, and according to the plan's overall strategy.	
The plan's economic strategy is at odds with its housing delivery capabilities. Capacity is 463 per annum, but the employment need is 412,460sqm of floorspace, which the plan admits is 'likely to draw additional workers into the city'. By aggressively supporting economic expansion the Plan may exacerbate issues with high land values and property prices and a lack of affordable homes.	The starting point for the Local Plan is that it should try to meet all needs. This is challenging within the city with many demands and many constraints. A balance must be struck. It is also important and expected that Oxford continues to play its leading economic role. However, housing supports this and is also a priority in terms of overcoming inequalities. The plan in Policy E1 does allow for housing on employment sites, and new employment sites are not permitted in many parts of the city. There are many sites in Oxford in existing commercial use where the landowner has no intention of converting to housing. By intensifying on existing employment sites, there is enough forecast capacity to meet demand. As a constrained but economically successful city, Oxford will be expected to draw people in to jobs.	None.
Reference should be made to encourage the conversion of vacant employment uses (offices, retail) into residential use where they will not compromise active street frontages within the city centre and district centres.	Policy E1 allows for residential use on employment sites. Policies C2 says: Planning permission will be granted for development of upper storeys of the Active Frontages for housing, student accommodation and other uses appropriate to a town centre, as long as the functioning of the ground floor unit(s) in the active frontage is not undermined.	None.
The plan proposes housing targets significantly above the city's deliverable capacity and relies heavily on development pressure on the urban	The housing need is above the identified capacity, but the Standard Method is used to understand the Local Housing Need. The city's	None.

edge. Lower impact growth scenarios need to be properly considered. The absence of agreed statements of common ground suggests the plan again fails to demonstrate full compliance with the Duty to Cooperate.	capacity is very constrained, and delivery of some of its needs outside the city has been something that has been necessary over time. An interim joint statement of common ground between all the Oxfordshire local planning authorities was available at the time the submission draft local plan was published. The intention is that an updated document will be provided on submission of the plan.	
The plan fails to acknowledge the interaction between housing and economic growth and that housing needs in Oxford may be higher than that established by the standard method. Housing supply is a key barrier to economic growth. Oxford's housing need should be derived from the SM LHN with a further uplift to reflect growth aspirations. There is an exceptionally strong case for a higher level of growth than is being provided for, whilst recognising Oxford itself has limited capacity. It will therefore require cross-boundary working with neighbouring Local Authorities.	The housing need is assessed by the standard method. The NPPF does make it clear that a housing requirement may be set above or below the housing need, if that can be justified. In the case of Oxford, a housing requirement below the housing need is considered to be justified because of the limited capacity.	None.
Concern is raised about how the Council has reached conclusions regarding the capacity of sites, anticipated delivery of sites, and therefore whether the proposed housing requirement is justified.	The SHLAA, Background Paper 015: Developing Site Allocations, and Background Paper 016: Efficient use of land, set out how sites have been identified, assessed and capacity identified. Dealing with unmet housing need in adjoining areas is set out in a series of Statements of Common Ground with the relevant planning authorities.	None.

The new housing needs figure covers 2025-2045. Therefore, the previously agreed figures also include homes that deal with un-met need for 2021-2025. Current provisions to meet unmet housing need have not delivered as expected, and, if relied upon, are unlikely to meet the full scale of Oxford's unmet housing need, either as arising from the standard method, or linked to the economic growth ambitions envisaged by the Oxford Growth Commission. Given nothing has been delivered so far, consideration should be given to the deliverability of the existing unmet need sites. Combining the confirmed figures (not including West oxfordshire because its figure is unknown) gives a total of 11,180. This is a shortfall of 1,293 from the unmet need of 12,473.	Dealing with unmet housing need in adjoining areas is set out in a series of Statements of Common Ground with the relevant planning authorities.	None
Oxford must clarify where the un-med need is to be met and how. Through the plan and Joint Interim SoCG it is not clear how this will be done.	The intention is to submit more information about this in a Memorandum of Understanding/final joint Statement of Common Ground with the other Oxfordshire local planning authorities.	None.
The Plan puts forward a reduced housing need figure from that in the withdrawn Oxford Local Plan 2040 and it also uses SHLAA findings to justify a capacity-based requirement. These two choices will lead to delivery of fewer homes, in contrast to the plan's aims. The approach lacks ambition and is likely to	At the time of the Oxford Local Plan 2040 (now withdrawn), the Standard Method was not framed as the only way to calculate housing need. The Standard Method was also very different to the current standard method. It was not considered that the previous standard method was a good representation of housing need in Oxford. Whilst Local Plans can set a	None.

exacerbate the existing housing supply problems in the city. The city can only demonstrate a 2.88 year housing land supply, which is proof that the Council is failing to address the housing crisis. There is no explanation of why the City Council has changed its growth ambitions in the LP45 but not changed its objectives or core themes.	housing requirement that differs from the Standard Method, the Standard Method is representative of the Local Housing Need. The current Standard Method gives a better approximation of housing need in Oxford.	
In the previous version of this Plan [withdrawn 2040 plan] Oxford City Council did not use the standard method to calculate housing need as it did not give a sufficiently large figure. This time they claim to have used the standard method, but come up with a very similar figure to the last iteration of the Plan and still claim they cannot meet it from within the City Of Oxford. So they again want to export it to surrounding Districts to develop more Green Belt countryside on the edge of Oxford and harm local communities, including those in our parish. The Plan carefully does not reveal how the figures were calculated or what background figures were used so it must be assumed they used the same ones as before. Comments are made in the representation about the HELA that supported the 2040 plan, which are not included her.	The starting point when assessing need is not to think of a figure, but to consider an appropriate methodology for assessing need. The NPPF from December 2024 (post the 2040 plan) says that 'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.' The supporting text to Policy H1 is very clear that the Government's Standard Method was used to assess housing need: 'The minimum housing need figure for Oxford has been calculated by using the Government's Standard Method as set out in National Planning Policy and guidance.'	None.
Paragraph 5.11 of BP001 refers to the 14,300 homes previously apportioned to neighbouring authorities. This is the provision from 2011, agreed in the adopted OLP2036.	The interim joint Statement of Common ground set out how each district is dealing with unmet need, and an updated in a final SoCG or a Memorandum of Understanding.	None.

The Interim Joint Statement of Common Ground is not amongst the papers supporting the current consultation, and therefore the situation is opaque as to how housing provision in adopted Local Plans contributes towards meeting unmet needs over the plan period.	The interim Statement of Common Ground was available at the time the Regulation 19 plan was published.	None
The Interim Statement of Common Ground provides details on the commitments towards Oxford's unmet housing need in the adopted and emerging plans of neighbouring districts (as of January 2026). However, as these emerging plans are not adopted, it remains unconfirmed whether the City Council's unmet need will be fully met.	The level of commitment in local plans of neighbouring authorities depends on the timing and progress of those local plans, which is out of the control of the city council. However, what can be ensured is that each district has agreed and committed to taking the full amount of Oxford's unmet need. This agreement will be set out in an update to the interim statement of common ground, or in a memorandum of understanding.	None.
The policy only refers to the capacity of the city, without mentioning the housing need figure as calculated by the Standard Method, or 21,740 dwellings. It also does not set out a strategy for how the Council will be delivering the remaining 12,473 homes and there is no clear spatial strategy for this. As such, the policy is contrary to paragraph 61 of the NPPF in that it fails to meet the area's identified housing need. The Oxford Growth Commission's Interim Report refers to the lack of such a strategy stating: "Delivering on the strategic vision requires a spatial investment and land use strategy across the County that joins up economic growth with investment in transport, new housing including new	The supporting text to policy H1 does set out the level of need as calculated by the Standard Method. There is agreement with the neighbouring Oxford districts about Oxford's unmet need. It is for each district to set it own spatial strategy and determine how they deal with unmet need within their area.	None.

affordable housing, achieving net zero, nature recovery and the environment, and skills and employability. A vital element in such a strategy is aligning economic growth with requirements for new housing to improve affordability and reduce commuting pressures [...]"		

Policy H2

POLICY	H2			
All respondents **supporting** policy	30.6	43.6	57.2	124.2

COMMENT SUMMARY	OFFICER RESPONSE
Policy is sound	Support is welcomed
Support seeking to deliver affordable housing in line with local need. Also need to consider need for affordable housing for NHS staff and other health and care providers. Recommend: engaging with NHS partners (ICB, Trusts, and ICS partners); factoring need for NHS staff into housing needs assessments and other evidence base; consider site allocations for NHS staff especially sites near large healthcare providers.	Support is welcomed. The suggested measures have all been addressed through the plan preparation: there has been regular engagement with the Health Trusts and Statements of Common Ground are also being prepared to summarise key issues; housing need assessment is now replaced by Standard Method (as prescribed in national policy); there are multiple site allocations for residential close and even onsite at the large healthcare sites, some of which are also identified as suitable for employer-linked affordable housing which would prioritise homes for healthcare workers.
Support the alterations made to this Policy since the reg 18 stage, in particular the exclusion of the wording "provisional requirement, subject to further viability testing".	Support is welcomed

POLICY	H2				
All respondents **raising objections** on this policy/chapter	47.5	57 .2	58.5	59.5	60.5
	69.7	89.5	112.4	118.4	134.13
	136.3	157.5	159.6		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

South Oxfordshire District Council has made a representation relating to Policy H2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Vale of White Horse District Council has made a representation relating to Policy H2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The prioritisation in the cascade (in S4) of first allowing reduction of net zero offset payments, and relaxation of parking standards, and only lastly allowing reduction in affordable housing (and even then staged to protect social rent as far as possible,) may make sense in Oxford but it risks making schemes that could viably deliver a lower affordable housing % non-viable or forcing repeated viability disputes, which is exactly what NPPF and PPG seek to avoid. Ie the cascade of policy relaxation is not in practice consistent with NPPF para 35 and viability guidance.	The viability evidence base for the plan has tested individual policies and the cumulative plan requirements, and the level of contributions sought have been set accordingly so that they do not undermine the deliverability of sites. The prioritisation in the stepped approach in S4 reflects the urgent need for affordable housing in Oxford, and in particular social rent tenures. The approach in policies H2 and S4 are consistent with the NPPF.	None
Should increase the proportion of new homes for social rent to the absolute possible maximum. Bringing down the housing waiting list should be prioritised over opportunities for people hoping to get on the housing ladder. In policy H2, replace “at least 80%” (of affordable units on the site should be provided as onsite social rented dwellings) to “90%”. See discussion in question 38 for why this would make the plan sound.	The tenure split in H2 is driven by priorities of the plan (to address housing needs of those in greatest need) but must also not undermine viability. Social rent is in great demand in Oxford but is also the most expensive to build (due to the larger discounts on returns). So to raise the requirement to 90% would likely have knock-on viability impacts on sites, for example it may result in the overall target of 40% across the site not being viable and could result in fewer affordable homes overall.	None

The proposed split of 80% social rent/20% intermediate disincentivises build to rent investors due to the scale of their operations needed for viability. As many sites in the city are small to medium size, the total number of private and intermediate units to be delivered per site is lower than many investors and developers require. A more flexible position or a cascade should be included in the policy. This will result in more housing overall and therefore more affordable housing being delivered in the City. Encouraging intermediate tenures will also help to address affordability pressures in Oxford and the need to support talent retention of graduates. Amend bullet a) as follows: "At least 80% of the affordable units on the site should be provided as onsite social rented dwellings unless an alternative has been agreed with the Council, taking into account demand for all housing types in the City. The remaining element of the affordable housing may be provided as intermediate forms of housing onsite provided that they are affordable in the Oxford market".	The 80/20 tenure split reflects the priority to deliver social rent affordable housing for those in greatest housing need. The policies already allow for some flexibility to take site by site circumstances into account where applicable, but this should be only a minority of schemes, in order to not add unnecessary complexity or delays to the development management process, or uncertainty to developers and communities, and there is a cascade approach set out in Policy S4 if a site cannot viably deliver the policy requirements.	None
Oxford City policies of zoning development land specifically for employment has increased the price of land for housing and made houses even more unaffordable. The questionable assessment of development land will also result in an increase in land prices and thus housing. Make the policy allowing housing on	The plan supports the conversion of employment sites to residential in Policy E1 where the landowner is interested in doing so. Many employment sites in Oxford also qualify for permitted development rights for conversion of office to residential.	None

employment land effective by making the assessment for housing suitability fair and transparent with an aim of increasing housing on land zoned for employment.	The assessment of suitability for residential is published in the Strategic Housing Land Availability Assessment. A particular challenge in recent years is that retaining employment uses often provides a higher return to the landowner.	
Not all development typologies can meet the 40% AH target, so the opening sentence of S4 is untrue – decision makers cannot assume development that meet the policies in this local plan are viable. Amend wording to “where viable a minimum of 40% of units ...” to ensure policy is consistent with the evidence. The draft policy should recognise that affordable housing requirements will be determined through a site-specific approach.	The policies already allow flexibility to take site by site circumstances into account where applicable. It does not need to specify “where viable” or that affordable housing requirements should be determined “through a site-specific approach” because that is already addressed in Policy S4 Plan Viability, which sets out a stepped cascade in the event that policies in the plan result in a site being unable to deliver a viable development.	None
The stronger wording and definition of "truly affordable in the context of the Oxford housing market" must remain unaltered. We would seek that the word " should" would be better replaced with " Will or Must", to further strengthen this policy.	It is the intention to retain the wording about “truly affordable”. This is an important principle in the Plan to deliver affordable housing that meets needs of local people, recognising that some models of affordable housing are not actually affordable in the Oxford context. “Should” is used to allow flexibility to respond to site specific circumstances, such as viability. It is the expectation but there may be exceptions.	None
West Oxfordshire District Council has made a representation relating to Policy H2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Oxfordshire County Council has made a representation relating to Policy H1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Residential development currently faces significant delivery challenges because of reduced building efficiencies following regulatory changes, increased build costs, increasing developer contributions, falling capital values in real terms, and complex infrastructure requirements to transform large-scale brownfield sites. Templars Square is not immune to these realities and the likelihood of a scheme at the site meeting H2 requirements, as drafted, is limited. Given the Viability Assessment evidence base document refers to a 40% target (due to the significant variations on a site-by-site basis) whereas Policy H2 refers to a 'minimum' 40% and does not acknowledge the site-specificity highlighted in the evidence base document. We consider that draft Policy H2 is not adequately "justified".	The Plan allows flexibility to take site by site circumstances into account where applicable. Policy S4 Plan Viability sets out a stepped cascade in the event that policies in the plan result in a site being unable to deliver a viable development.	None
Object to this policy requirement being related to the gross number of dwellings in a development. If a gross requirement is applied to the redevelopment of sites, it will significantly affect the viability of schemes and discourage the regeneration of parts of the City. Instead, this requirement should relate solely to the net number of new homes to be provided.	The policy requirement in Policy H2 applies to all dwellings within the red line of a planning proposal. This is the same approach that has been applied and demonstrated in the current adopted and previous local plans in Oxford. If there are existing dwellings included within a red line it is usually because they are being materially altered, so the policy would apply. If	None

Amend Policy H2 to read: “On self-contained residential developments (including Use Classes C3 and C4 but excluding self-contained student accommodation, older persons accommodation and employer-linked housing) where sites* have a capacity for 10 or more homes (gross), a minimum of 40% of the *net increase in* units on the site should be provided as homes that are truly affordable in the context of the Oxford housing market. On sites in the Green Belt or released from the Green Belt, this should be a minimum of 50% *of the net increase in units on the site.*”	a property is not being altered as part of a development it would usually be outside of the red line, so would not be counted in the calculation of the gross number of units.	

Policy H3

POLICY	H3		
All respondents **supporting** policy	30.7	102.2	106.4

COMMENT SUMMARY	OFFICER RESPONSE
Policy is sound [reason not specified]	Support noted
Welcome the exemption for developments within existing and proposed university or college campus sites, including the Marston Road site (SPE3).	Support noted
Assuming that contributions towards affordable housing provision from new student accommodation will not be sought where the proposal is within an existing or proposed university or college campus site, as defined in the glossary to the Local Plan, consider H3 to be sound.	Support noted

POLICY	H3				
All respondents **raising objections** on this policy/chapter	40.1	47.6	86.3	87.1	102
	105.1	112.5	114.3	129.4	130.3
	133.3	134.2	138.8	157.6	159.7

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
There is internal and NPPF viability tension because of multiple overlapping contributions (H2, H3, H4, H12). Individually, each policy may be justified, but taken together they impose high onsite affordable ratios on general housing,	The policy requirements in LP2045 have been informed by the Viability Assessment and the cumulative impacts have also been tested for policies which may have cost implications. The Viability Assessment therefore complies with	None

and contributions from employment and student accommodation even where those uses may compete for the same constrained sites. NPPF requires the cumulative impact of all policies "does not undermine the deliverability of the plan". The Plan acknowledges parking policy C8, net zero (R1) and affordable housing policies as the main viability risks but then adds strong affordable obligations on non C3 uses (H3) without clear evidence. The Reg 19 plan does not set out how this requirement meets Paragraph 58 of the NPPF. It is therefore not clear what identified harm or impact is being mitigated through the sought contributions such that the policy is not justified nor consistent with national policy, particularly on mixed use sites where the delivery of affordable housing is not prevented by the inclusion of employment generating uses. The NPPF and NPPG only make reference to seeking affordable housing from major residential developments. There are no references to such contributions or provision being sought from commercial development.	the requirement in national guidance for a comprehensive assessment of all relevant plan policies.	
Object to Policy H3 (Parts (e) and (f)) seeking affordable housing financial contributions from new commercial development (i.e. 'proposals for major employment-generating uses (defined in Glossary), or flexible E-Class uses which could be used for employment-generating use,	Commercial developments have the potential to generate demand for affordable housing. Lack of affordable housing is often referenced as a constraint on Oxford's economic potential, and employers report difficulties in attracting and retaining staff because of the lack of	None

delivering a net gain in floorspace of 1000sqm GIA or more'). Parts e) and f) of Policy H3 should be removed. Major commercial developments already deliver significant financial contributions towards delivery of infrastructure, highways improvements and public transport improvements, including towards the delivery of the Cowley Branch Line, in addition to Community Infrastructure Levy which has increased fivefold since August 2025. The requirement for a further financial contribution towards affordable housing would render investing in the City unfavourable and unviable and undermine the deliverability of the plan's economic objectives, particularly in a competitive global marketplace where economic investment in the R&D sector can be uprooted and taken elsewhere with more favourable planning and market conditions. The policy relies on a high-level assumption that employment development will generate a need for affordable housing with no evidence that it will create this need and no reference to market housing need. The level of contribution is an arbitrary figure and has not been sufficiently demonstrated to be at a level to mitigate any identified need or impact. It also assumes that employees will live in Oxford, rather than more	affordable housing. Therefore, there is a clear justification for the introduction in Policy H3 for a requirement for contributions from employment development to affordable housing. The intention when setting the level for these contributions is informed by the Viability Assessment evidence, so that it is set at a level that is easily affordable, whilst still ensuring a contribution is made to meeting the affordable housing needs generated by this kind of development. Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing.	

affordable locations in the surrounding Districts or further afield. The policy also assumes that all new commercial development will generate entirely new jobs for the City (which is rarely the case in major commercial developments) and fails to take into account companies moving from one part of Oxford to another and where the old premises are no longer fit for purpose or are being redeveloped for alternative uses, such as housing – where no additional need will be generated. Policy H3 should be amended to take account of the following changes: First Paragraph: Delete references to "and new employment-generating uses". Parts (e) and (f): Delete these requirements.		
The Inspector's Report for the Westminster City Plan (March 2021) provides a directly relevant precedent. The Inspector recommended deleting Policy 10, which - like Policy H3 - sought affordable housing contributions from commercial developments of 1,000sqm or more. The Inspector concluded that the NPPF and PPG only anticipate affordable housing requirements being applied to major residential development and make no provision for securing such contributions from commercial or any other form of non-residential development. The Inspector also found that the policy would fail	The local circumstances in Oxford mean that seeking the contribution is justified for LP2045. The level of contributions has been set at a minimal level so that it is deliverable across the majority of (major) commercial sites, as indicated in the Viability Assessment modelling.	None

the statutory tests for planning obligations because it lacked a direct relationship to the development, provided no guarantee that funds would be spent near the contributing site, and relied on standardised tariffs that bore no relation to the actual cost of delivering affordable homes. Moreover, the proposed tariff was considered fundamentally flawed because it applied uniformly across all commercial uses despite clear evidence of differing viability profiles. The Inspector ultimately concluded that there was insufficient justification to demonstrate that the contributions would be fairly and reasonably related in scale and kind. The parallels with Oxford's proposed Policy H3 are clear, and the Westminster highlight the policy and legal concerns with requiring affordable housing contributions from commercial development. A similar Policy was proposed in the Westminster City Plan 2019-2040 (examined in 2020). Policy 10 of the Submission Draft included a requirement for contributions from commercial developments. The Inspectors recommended that the Policy be removed, noting that the policy requirement "would simply require financial contributions to the City-wide Affordable Housing Fund. It would not achieve the key objective of the submitted Policy 10" (paragraph 85) to ensure mixed, inclusive and cohesive communities.		

Oxford University Developments has made a representation relating to Policy H3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Seeking such a contribution would not meet the three tests for planning obligations set out under Regulation 122 of the CIL Regulations and Paragraph 58 of the NPPF as the obligation is not necessary to make commercial developments acceptable in planning terms and not directly related to the development. Employment development would be supported by other policies in the Plan and such a contribution is not needed to make the development acceptable in planning terms. Affordable housing contributions from major commercial developments do not meet the legal tests of Reg 122 of the CIL Regs 2010. Oxford has a pressing need for new commercial and employment space to support local businesses, universities and research institutions. Introducing new financial obligations on commercial schemes for residential development risks constraining delivery and pushing employment space out of the city. The first paragraph should be amended to the following: "The City Council will seek financial contributions towards the delivery of affordable housing from proposals for new purpose-built student accommodation, and new older people's accommodation."	The contribution towards affordable housing is necessary to make the development acceptable and directly related to the development in that it increases jobs and thus increases pressure on housing in the city.	None

The level of contribution is an arbitrary figure and has not been demonstrated to be at a level to mitigate any identified need or impact, and is not related in scale or kind to the proposed development. In addition, as the contribution would need to be implemented through planning obligations the requirement would fail the Regulation 122 tests. Employment development would be supported by other policies in LP45 and such a contribution is not needed to make the development acceptable in planning terms. There is no direct relationship to the proposed development and the scale of payment is no related to the actual cost of delivering affordable housing. Seeking such a contribution would not meet the three tests for planning obligations set out under Regulation 122 of the CIL Regulations and Paragraph 58 of the NPPF as the obligation is not necessary to make commercial developments acceptable in planning terms and not directly related to the development. Employment development would be supported by other policies in the Plan and such a contribution is not needed to make the development acceptable in planning terms.		
The new CIL rates (Aug 2025) include a 400% increase in the levy charges for Class E, B2 and B8 uses. The new CIL rates and the proposed Policy H3, could adversely impact the deliverability of Osney Mead. In turn, this raises risk that the deliverability of the Local Plan (as	Commercial developments have the potential to generate demand for affordable housing. Lack of affordable housing is often referenced as a constraint on Oxford's economic potential, and employers report difficulties in attracting and retaining staff because of the lack of	None

well as the current adopted West End and Osney Mead SPD) will be undermined. Although the viability assessment notes that it will have a modest impact on development, it needs to demonstrate specifically that the site allocations, particularly those of strategic scale, have been tested fully and account has been made of such sites incurring abnormal and extraordinary costs. Without this it is not possible to consider the soundness of the proposed policy. Seeking affordable housing contributions from commercial development, particularly in light of the revised CIL rate for Class E offices and R&D which has increased from £33.74 to £168.74 per square meter GIA (non-indexed), would render schemes undeliverable, especially working within constraints of complex urban development and within the sensitive heritage constraints that pertain in the city with regard to quantum of acceptable development. Major commercial developments already deliver significant financial contributions towards delivery of infrastructure, highways improvements and public transport improvements, including towards the delivery of the Cowley Branch Line, including some support already taking place outside of planning conditions/obligations attached to specific developments. The requirement for a further	affordable housing. Therefore, there is a clear justification for the introduction in Policy H3 for a requirement for contributions from employment development to affordable housing. The intention when setting the level for these contributions is that it is guided very much by the viability report, so that it is set at a level that is easily affordable, whilst still ensuring a contribution is made to meeting the affordable housing needs generated by this kind of development. Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing. The viability for the site allocations has been tested through a typologies approach in the Viability Assessment, which tests a range of typologies to represent the types of sites anticipated to be developed during the plan period.	

financial contribution towards affordable housing would further increase the cumulative policy cost and create an unfavourable environment for economic investment in the City. This would undermine the deliverability of the plan's economic objectives through rendering investing in the City unfavourable and unviable, particularly in a competitive global marketplace where economic investment in the R&D sector can be uprooted and taken elsewhere with more favourable planning and market conditions.		
Policy does not give due consideration to ensuring the viability of essential employment uses, particularly where these are delivered as part of mixed-use schemes where the residential element is already subject to an affordable housing requirement. Propose a modification to Policy H3 to ensure that a more nuanced approach to securing affordable contributions from mixed use sites will be considered at the application stage.	If a mixed-use site includes both residential and commercial elements, then the affordable housing contributions would be calculated apply a pro-rata approach according to those different elements (set out in second paragraph of H3). So that the site is treated on a comparable basis to other sites bringing forward similar uses.	None
Object to Policy H3 (Parts (e) and (f)) in relation to seeking affordable housing financial contributions from new commercial development. The City Council included such a policy requirement in a previous adopted Local Plan. However, this was dropped in the extant Local Plan. There is no clear reason to re-introduce such a policy now.	Viability evidence at the time of preparing LP2036 indicated that seeking contributions was not viable, however the latest Viability evidence for LP2045 indicates that viability of commercial developments has shifted in recent years and that it is now viable.	None

The housing requirement takes into account the need for housing generally in the local area and also the level of affordable housing. There is no evidence that employment development will create an additional affordable housing need. The policy relies on a high-level assumption that employment development will generate a need for affordable housing. If this policy is taken forward this assumption should be assessed on a case by case basis. It also assumes that employees will live in Oxford, rather than more affordable locations in the surrounding Districts or further afield. The Policy fails to take account of a company moving from one part of Oxford to another and where the old premises are changed to housing – where no additional need will be generated. It assumes all jobs will be newly created which is rarely the case. In addition, chapter 3 of LP45 recognises that people will often commute to jobs within the City and that it is “easier to strengthen public and active transport systems to take people to jobs in the city rather than scatter employment to less sustainable locations." It makes no assumption for market housing need.	Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing, which is often referenced as a constraint to major employers in Oxford and to economic growth.	None

There is no certainty that planning obligations under this policy will actually deliver affordable housing in the City. There is no ability to ring fence the obligations to the identified workers being generated from commercial developments, or even if those workers would qualify for affordable housing. Background paper on affordable housing (reference BGP-002 Affordable Housing Reg 19) prepared by the Council states that: "Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing". The policy relies on a high-level assumption that employment development will generate a need for affordable housing with no evidence that it will create this need and no reference to market housing need. It also assumes that employees will live in Oxford, rather than more affordable locations in the surrounding Districts or further afield. The policy also assumes that all new commercial development will generate entirely new jobs for the City and fails to take into account companies moving from one part of Oxford to another and where the old premises are no longer fit for purpose or are being redeveloped for alternative uses, such as housing – where no additional need will be generated. For instance,		

Novo Nordisk is relocating from the Innovation Building in Headington to the Iversen Building at TOSP. The policy assumes all jobs will be newly created which is rarely the case in major commercial developments and evidenced by this specific example at TOSP. Policy H3 should be amended: First Paragraph: Delete references to "…and new employment-generating uses". Parts (e) and (f): Delete these requirements.		
The policy is unjustified as the economic gain or loss will be the same for existing or new campuses or institutions, further provision of student housing of itself removes students from the housing market. Student accommodation can be provided by non-University institutions (Boarding schools, Language schools). Remove applicant specific text, make effective as above, and apply contributions to all developments equitably. At each Local Plan, Oxford City Council has tried, under pressure, to give existing Universities preferential treatment, each and every time the Inspector throws it out as a policy cannot be dependent on applicant identity.	For new student accommodation, the policy does not apply to development within university campus sites or redevelopment of existing purpose-built student accommodation that is currently and will continue to be owned and/or managed by the universities. The reason for exemption is because when student accommodation developments are off-campus, then they are typically on sites that could equally be suitable for non-student homes, from which affordable housing would normally be sought. However where student accommodation is developed within existing university campuses, market housing would not usually be provided within those sites, so those sites would not be providing affordable housing.	None
Disagree with the requirement for older persons housing to provide contribution towards affordable housing, because the evidence indicates that 40% is not achievable and that	H3 does not require onsite provision of affordable housing from older persons accommodation. Section (c) indicates that financial contributions will be sought towards	None

only in the highest value areas would any affordable housing contribution be achievable. Policy should be amended to remove the requirement for specialist forms of accommodation such as older persons housing to provide affordable housing onsite.	the delivery of affordable housing as the default policy, or as an alternative the affordable housing contribution can be provided on-site where both the City Council and the applicant agree that this provision is appropriate. The Viability evidence indicates that 40% is viable in many cases, and where it is not then there are provisions in S4 which sets out a cascade of adjustments for proposals to work through. Financial contributions are required on a comparable basis [to the 40% required in H2] so that the development of sites for residential is not disadvantaged in the market or viability terms.	
The Universities do not support the inclusion of purpose-built student accommodation within Policy H3. Purpose-built student accommodation already functions as an affordable form of housing relative to the open market and plays a crucial role in reducing pressure on the wider housing stock. In addition, the number of sites suitable for new student accommodation is inherently limited. Opportunities for speculative privately-led student schemes have notably declined in recent years, reflecting both land supply constraints and the increasingly stringent location controls in Policy H8. We expect this trend to continue, and the restricted pipeline raises questions about whether the proposed contributions policy is proportionate or justified. By attempting to align the affordable housing	Many sites for student accommodation could equally be suitable for non-student homes, from which an affordable housing contribution would normally be sought. The exception to this, is where student accommodation is developed within existing university campuses, because market housing would not usually be provided within those sites. As such, it is reasonable for the Plan to include a policy which seeks affordable housing contributions from new purpose-built student accommodation. Purpose-built student accommodation is not an affordable type of housing. It is a specific type of housing that meets one type of need in Oxford. This has to be balanced so that all types of housing can be delivered within the city.	None

expectations for brownfield commercial-to-residential schemes with those for brownfield student accommodation schemes, the policy risks making new student developments financially unviable. Inevitably, any additional financial burden would translate into higher rents for students, undermining affordability and potentially reducing the availability of purpose-built stock. The City Council has not, to our knowledge, published any assessment of the policy's likely impacts on student accommodation rents or the future demand and supply balance for purpose-built student housing. A detailed impact analysis is therefore required to demonstrate that the policy is deliverable, justified, and aligned with the Council's wider objectives for affordability and housing choice.	The local circumstances in Oxford mean that seeking the contribution is justified for LP2045. The level of contributions has been set at a level so that it is deliverable across the majority of (major) commercial sites, as indicated in the Viability Assessment modelling.	

Policy H4

POLICY	H4		
All respondents **supporting** policy	87.2	89.6	120.3

COMMENT SUMMARY	OFFICER RESPONSE
Oxford University Developments has made a representation relating to Policy H4, which is summarised and responded to in the Statement of Common Ground.	Support is welcomed.
Oxfordshire County Council has made a representation relating to Policy H4, which is summarised and responded to in the Statement of Common Ground.	Support is welcomed.
Support the inclusion of Ruskin Field (SPE14) being included in the list of sites suitable for employer-linked housing (and the corresponding cross reference in the site allocation policy for the site).	Support is welcomed.

POLICY	H4				
All respondents **raising objections** on this policy/chapter	47.7	69.8	106.5	111.3	138.9

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Employer linked housing (H4) may undermine mixed, balanced communities and long term flexibility. Tying occupancy to employment can	There has been a similar employer-linked policy in the adopted Local Plan 2036 in place since 2020, and there is no evidence that applying	None

lead to mono tenure, employer dominated enclaves, which may not align with NPPF's objective of creating "mixed and balanced communities" and avoiding undue segregation by tenure or occupation. By exempting these sites from the usual H2 obligations, the Plan may allow large quantities of affordable provision that is not open to the wider local housing need, thereby partly frustrating the broader objective of meeting general affordable housing needs in Oxford, not only institutional staff needs. The fallback that 40% must be transferred to a RP if employer demand ceases could also be criticised as weak: it implies up to 60% of the stock could remain in a limbo or be sold on the open market, which would effectively reduce the level of affordable housing stock, which is inconsistent with the strong affordable housing priority in the overall Plan.	the similar policy has given rise to these sorts of issues. Meanwhile this period has seen development of staff accommodation on the JR and Churchill Hospital sites, which have helped to address staff accommodation and recruitment concerns. The fallback position of transferring 40% to an RP, would effectively be the same amount of affordable housing as if the site had been developed as a mainstream housing site (ie applying Policy H2 requirements).	
Oxfordshire Health NHS Foundation Trust has made a representation relating to Policy H3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
This policy does not seem to take into account the fact that for couples living together both partners will have careers/jobs with different employers in different locations.	Policy H3 requires that an affordable housing approach will need to be agreed with the Council for each proposal, setting out how the proposed affordable homes will be developed and managed by the employers (or by development partners on their behalf) to meet the housing needs of their employees.	None

Policy which allows for homes which are affordable to be provided by key employers is positive and can help stimulate essential development, particularly on sites with a longstanding allocation which has not progressed. Government Buildings and Harcourt House site SPE3 should also be included as a suitable site for employer-linked. This will improve the likelihood of delivery of development on the site, benefitting effectiveness of the Plan, and so soundness. The Centre has a need and duty to provide affordable housing for its permanent staff working in the teaching, administration, or other essential, on-site support services. The city's restricted housing market and extremely high house prices make it very difficult to recruit and retain essential staff. The same is true for early career academics who are forced to turn down positions because they cannot afford Oxford rents.	The policy is designed to enable delivery of on-site affordable housing on sites that would not be suitable for delivering housing to the usual requirements of Policy H2. It is not intended as an alternative to H2, it is a supplementary approach to be used only in specific circumstances. Site SPE3 is judged as suitable for coming forwards under the normal H2 Affordable housing requirements. That does not preclude the landowner bringing forward a proposal for 100% affordable housing should they wish to provide affordable staff accommodation, but the usual H2 requirements would still apply.	None
Ever increasing expansion of the main employers – Oxford University, OUHT and Brookes, BMW, are the root cause of housing need in the city. The Headington hospitals in particular (JR, Churchill and NOC) have capacity for 1000s of homes in highly sustainable locations, using their football fields of car parks which would reduce the need to travel and provide homes and save surrounding countryside and the few remaining green spaces in the city. Either employers provide	The policy is designed to enable delivery of on-site affordable housing on sites that would not be suitable for delivering housing to the usual requirements of Policy H2. It is not intended as an alternative to H2. Each proposal will need to have agreed with the council an affordable housing approach to set out issues such as eligibility, rent policy and rent levels, which will address queries raised in	None

housing, or pay heavy contributions to build housing based on increased staff numbers. They cannot simply create housing need, traffic problems and dump the consequences onto the taxpayer and ordinary citizen. Employment status is difficult to determine, as many may be Inside IR35 contractors, working for subcontractors and companies (eg: cleaning, catering, retail), placements, students on work experience and training, may require short term accommodation of specific projects or tasks. Vacancy periods are not covered which may provide short term accommodation for tourists etc. The policy is too complex, restrictive, and provides no incentives or penalties for nondelivery and therefore unjustified and ineffective. This is therefore not positively prepared. Better solutions such as allowing market housing or straight sale of land would provide more homes. Mandatory contributions to housing related to staff numbers, with discounts where on-site housing is provided, and further discounts where destination parking space is used. Allow market component as incentive to delivery. Some general housing should be allowed. A contribution to housing stock is valuable however delivered, and should be determined in part by the developer.	these comments about discounts, eligibility of staff, and other implementation issues. Sites which fall within the criteria of a campus site of the colleges (bullet point 1 of H4) are not individually listed but is specified in the individual site allocation policies.	

Sites should not be listed as this is not effective as the list given is not the same as the Site Policies, Headington Hall and Ruskin are both absent.		

Policy H5

POLICY	H5
All respondents **supporting** policy	111.4

COMMENT SUMMARY	OFFICER RESPONSE
Recognition that mixes of dwellings sizes provides a balanced community, meeting specific housing needs at a particular time. Pleased that policy does not apply to employer-linked affordable homes. Support higher density developments in District Centres.	Support welcomed

POLICY	H5
All respondents **raising objections** on this policy/chapter	138.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not justified - not clear whether a one bedroom apartment would be a “home” or not.	Any self-contained residential dwelling is classed as a home. The policy applies to all homes or dwellings (flats or houses).	None

Policy H6

POLICY	H6
All respondents **supporting** policy	139.5

COMMENT SUMMARY	OFFICER RESPONSE
Support policy and the contribution it will make towards retaining the existing housing stock.	Support welcomed.

POLICY	H6	
All respondents **raising objections** on this policy/chapter	30.8	128.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Suggest some limitation on the conversion of dwellings to being used for short-term let (i.e. those which are for regular letting to a succession of short-term visitors)	Policy generally resists the new loss of dwellings, including for short term lets.	None.
Unsound as not justified - believe current drafting of Policy H6 fails to provide any flexibility for highly site-specific circumstances/ truly exceptional scenerios which may make a property less well suited to retention as a private dwellinghouse. The list of exemptions within the policy would benefit from the	The housing need is much greater than any need for short term lets. Oxford cannot meet its full housing need and therefore it is important that the existing stock is protected.	None.

inclusion of an additional criterion to reflect such circumstances. Shark House cited as example of where such a policy approach could be applied successfully.		

Policy H7

POLICY	H7
All respondents **supporting** policy	30.9

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reasons given.	N/A

POLICY	H7		
All respondents **raising objections** on this policy/chapter	47.8	111.5	138.11

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not effective or consistent with national policy - Potential conflict between restricted HMO supply and affordable options for key workers. Plan recognises that HMOs "offer the only available and affordable solution for many people" but seeks to prevent "over-concentration". NPPF requires plans to meet the needs of different groups. The internal logical tension is: HMOs used as an acknowledged safety valve for affordability, but Policy H7 restricts further supply in areas where there are existing high concentrations. At the same time, Policy H8	There are negative impacts of HMOs being too highly concentrated. With no thresholds in place, areas could become dominated by HMOs which would affect ability to meet other housing needs e.g. family homes. The threshold based approach applies equally in all parts of Oxford allowing flexibility for new HMO in suitable locations whilst capping further creation in others. The approach will have a greater material impact where there are already high concentrations of HMO.	None

constrains PBSA supply, and Policy H2's high affordable/ social rent requirement may reduce delivery of new low cost C3 stock. In combination, this risks under provision of low cost rented accommodation, weakening the Plan's ability to meet the NPPF requirement to address housing needs of those who rely on the private rented sector.		
Oxford Health NHS Trust has made a representation relating to Policy H7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Not justified - Policy is ineffective as the term HMO is not defined. The statement that new build HMOs are undesirable due to social housing need is unjustified and unexplained. This could be ineffective as it may have a negative effect on student housing provision, discouraging families from renting bedrooms.	The Glossary includes a definition of HMO. The supporting text to the policy indicates the policy does not allow new **purpose-built** HMO as this type of accommodation reduces potential for delivering housing that meets greater needs (e.g. social rented housing). Further explanation on HMO is set out in BGP.3 Specialist Housing. The Plan does not discourage families from renting bedrooms. An owner occupier can have up to 2 lodgers living in the property, for the purposes of the Housing Act 2004, the property would not be considered an HMO. Owner occupier includes the registered owner and any member of their household. Any subletting in a rented family home where there are 3 or more people from 2 or more households would likely result in an HMO being formed. In most	None

	cases, summer school students who are hosted by a family are unlikely to be deemed as occupying the property as their main or only home, they are essentially guests. Further guidance is provided in Appendix 2.2 which states that buildings NOT counted as HMO include a homeowner together with up to two lodgers.	

Policy H8

POLICY	H8
All respondents **supporting** policy	102.3

COMMENT SUMMARY	OFFICER RESPONSE
The College considers the locational criteria set out in Policy H8 to be "sound" overall.	Support welcomed

POLICY	H8				
All respondents **raising objections** on this policy/chapter	15.1	47.9	93.3	105.2	138.12
	160.1				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The city centre is not defined by reference to a plan. This amounts to a blanket presumption in favour of student accommodation without protection on suitability of uses for residents within the city centre streets.	The city and district centres have been identified as one of the areas where student accommodation is most suitable. These are generally busier areas with a higher level of amenities within walking distance, and which are frequently served by public transport. Delivering student accommodation in only the most suitable locations can help to ensure that quieter residential streets are not subject to unacceptable changes in character or increased activity.	None

There is a contradictory stance on the benefits of purpose-built student accommodation (PBSA). On one hand, the Policy Context acknowledges that PBSA can provide "low-cost housing that takes the pressure off the private rented sector", yet also argues that PBSA could "lead to a dominance of student accommodation" that would "undermine the desire to deliver mixed and balanced communities" because there would be a high proportion of transient occupants. This, coupled with the restrictions in Policy H9 will result in the knowledge economy facing a growth ceiling not shared by other employment sectors. In combination, policies H7 (HMO cap at 20% within 100m), H8 (strong locational limits), H9 (academic thresholds) and H3 (PBSA contributions) may be internally inconsistent with the strategic intent stated earlier in the chapter – to use PBSA positively to relieve pressure on the general housing stock where more can be released to the general community due to the higher density of PBSA.	The policy seeks to strike a balance. The Policy Context section does acknowledge that student accommodation should continue to be provided to meet the needs of both universities. However, whilst provision of PBSA can free up market housing, it can also compete for sites with market housing that delivers on-site affordable housing. The policy approach is about managing the impacts of student accommodation by ensuring it is in suitable locations. For the reasons given above, the strategic intent is not to use PBSA to relieve pressure on the general housing stock. The Local Plan approach is to limit the over-concentration of HMOs (Policy H7), only allow student accommodation in the most suitable locations (Policy H8) and encourage universities to provide accommodation (in these locations) through the thresholds policy (Policy H9).	None
Additional wording should be included to address the impact of additional student accommodation on the overall mix and balance of small communities such as New Marston (where there are three site allocations that might involve student housing).	The policy seeks to ensure that new student accommodation is located within the most suitable locations and the criteria within Policy H8 should help to ensure that any potential impact of additional student accommodation to the community is minimised. For example, criterion b of the policy states that for developments which contain 25 or more	None

	student bedrooms, community amenity space will need to be included within the design, which will allow students to gather and socialise.	
Generally supportive of policy, however it is too restrictive to both universities and the delivery of student accommodation by third party providers, given its interaction with Policy H9. The wording could be adjusted to confirm that if the criteria are unable to be met, then there is a requirement to demonstrate that there are no reasonable alternatives available. Greater flexibility should be taken on windfall locations to help both universities meet the requirements of the threshold in Policy H9. Suitable locations should also include along arterial routes and those sites within a 15-minute walking distance of a campus/college. It is considered that the arterial routes in/out of Oxford present a logical and suitable option for locating new student accommodation given the frequency of public transport services along these routes and ease of access to/from both educational and social facilities and the reduced sensitivity of the residential environment. There are other policies in the Plan which address concerns relating to unacceptable changes in character to residential streets and ensuring that new development does not lead to adverse amenity impacts. With the exception of students with accessibility requirements, it would be	The policy sets out what are considered to be suitable locations, of which there are sufficient to meet anticipated needs within the thresholds set in Policy H9. The intention of the policy is to ensure a balance is struck between providing accommodation for students, but also for all other types of housing needed within the city. Allowing student accommodation along the whole length of arterial routes, many of which vary in character significantly along their length and may be very suburban and residential in character, has the potential to significantly change their character which could have a negative impact on the local community.	None

reasonable to expect that PBSA along arterial routes should also be car free.		
The draft National Planning Policy Framework (December 2025) is also relevant. Policy HO9 introduces a new location test for Purpose-Built Student Accommodation, focusing on whether residents can access their educational facilities by “walking, wheeling or public transport.” This indicates that a site served by a sustainable transport corridor can be acceptable in principle, rather than being assessed solely on its immediate adjacency to the institution. We would encourage Oxford City Council to adopt a similar approach.	The final framework has not been published to date. Furthermore, whilst provision of student accommodation can free up market housing, it can also compete for sites with market housing that delivers on-site affordable housing. The policy therefore aims to strike a balance so that all types of housing can be delivered within the city.	None
The policy is dependent on the identity of the applicant, which favours existing institutions and is an attempt to limit competition. There are not two but three universities in Oxford as University of West London owns the Ruskin Campus. Boarding/language schools are not included, neither are any institutions that don’t have a campus.	The policy is not dependent on the identity of the applicant. It refers to student accommodation throughout, including in the policy heading, and at no point makes any reference to a particular university.	None

Policy H9

POLICY	H9
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	H9			
All respondents **raising objections** on this policy/chapter	47.1	160.2	102.4	138.13

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Potential contradiction between policies H8 and H9 and the stated aim of taking pressure off the private rented sector. Policy H8 constrains new student accommodation to a narrow set of locations or on allocated sites. Policy H9 then restricts new academic development unless the universities are within thresholds for students living outside university accommodation, effectively using academic floorspace policy as a lever to control student numbers.	The intention of the policy is to encourage educational institutions to ensure there is sufficient accommodation for their students, and therefore to limit the numbers of students living in general market housing in the city. For institutions other than Oxford Brookes or the University of Oxford, and for those institutions if the thresholds are exceeded, the policy requires that there is a plan in place for managing the accommodation needs of additional students. It does not limit the number of students and it does not prevent academic facilities coming forward, it simply ensures that there is management of any potential growth of students needing to rely on	None

	the general housing market. Background Paper 003 explains further how this longstanding policy approach is intended to attempt to manage and minimise the pressures of students on the housing market and balance the needs of the student population as well as residents.	
Support policy overall and agree with the need to balance enhancements with the provision for student accommodation. However, whilst individual colleges are a constituent of the University of Oxford, they are a separate legal entity. On this basis, it would not be reasonable for the College to have facility restrictions placed upon them whilst they cannot fully control other institutions. To address this, additional wording such as; "Unless demonstrated that facilities associated with constituent colleges will have no impact on existing accommodation requirements for the relevant college" should be added to the policy.	This approach has applied to the University as a whole for decades, and the University is able to supply necessary monitoring each year across the colleges. The needs as a whole, and the expected growth in student numbers of the university, have been considered when setting the policy.	None
Cannot understand why the threshold figure for the number of full-time taught course students living in Oxford requiring accommodation outside University of Oxford-owned or managed accommodation has increased from 2,500 to 3,100, when the Council's Annual Monitoring Report (AMR) 2025 indicates that only 552 students were living outside of university-provided accommodation in Oxford.	The threshold levels for each institution have been reconsidered and have been based on the latest forecasting needs for each university, whilst ensuring they are still effective. They are set at a level that allows for the anticipated growth in students, alongside the understanding of supply and pipeline supply of student accommodation. The Council's AMR is a snapshot in time and reports on the effectiveness of policies using the latest and	None

	historic data, but it does not look ahead nor forecast growth.	
Fully approve of the intent, but unjustified as it depends on the identity of the applicant and excludes University of West London at Ruskin, and boarding and other institutions such as language colleges. Unclear if this applies to hospital students, postgraduates and trainees.	The policy is not dependent on the identity of the applicant, but applies to any higher education institution (that does not include all education facilities). The policy requires that, where there are proposals for new, redeveloped or refurbished academic, research or administrative facilities for higher education institutions, these will be acceptable either where there is a) the proposals would not facilitate an increase in students, or b) there is a plan in place for managing the accommodation needs of the additional students. In the case of Oxford Brookes and the University of Oxford, criterion b is clear that the application of the thresholds then set out in the policy will be used as a measure and to demonstrate whether this requirement is met. For other institutions, this will need to be demonstrated by the institution, rather than by the use of thresholds. Oxford Student Needs Assessment (Iceni, 2025) found no significant need for additional student accommodation for students at institutions other than the universities over the plan period, therefore thresholds can't be set and there may well be capacity within existing provision for any increases - but that will be for individual institutions to demonstrate. Further explanation can be found in Background Paper 003. Appendix 2.3 of the Plan contains more	None

	detail on how compliance with the thresholds will be calculated and which groups of students it applies to.	

Policy H10

POLICY	H10
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	H10
All respondents **raising objections** on this policy/chapter	No representations were made objecting to this policy.

Policy H11

POLICY	H11
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	H11
All respondents **raising objections** on this policy/chapter	49.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
In the 'Policy Context' section of the supporting text, reference should be made to Oxford Canal as well as main rivers as the need to maintain safe navigation is also relevant to the canal.	Agree that this should be referenced.	Propose to add a Main Modification to the fourth bullet to the 'Policy Context' section of the supporting text as follows: • There is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and Oxford canal and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.

Policy H12

POLICY	H12
All respondents **supporting** policy	30.1

COMMENT SUMMARY	OFFICER RESPONSE
Support the policy (although it could have a more positive statement to encourage more older persons accommodation).	The support is welcomed.

POLICY	H12
All respondents **raising objections** on this policy/chapter	No representations were made objecting to this policy.

Policy H13

POLICY	H13
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	H13
All respondents **raising objections** on this policy/chapter	No representations were made objecting to this policy.

Policy H14

POLICY	H14
All respondents **supporting** policy	159.2

COMMENT SUMMARY	OFFICER RESPONSE
Support.	N/A

POLICY	H14	
All respondents **raising objections** on this policy/chapter	110.1	138.14

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
1. Supporting text misrepresents boarding accommodation and fails to recognise the social, cultural, and economic benefits of boarding schools to the community and focuses on alleged negative impacts with little evidence/assessment as they are not included in housing assessment need 2. Supporting docs (background paper 003 and specialist housing bp) fail to evaluate the demand for boarding accommodation, its role in private	1. Not job of the plan 2. Evidence came from applications/DM - need to meet other housing types not boarding schools accommodation and can conflict with housing need 3. Application have been approved and conflicted with other land uses coming forward, where residential was expected to come forward to meet housing need	None

education and its broader significance, partly due to insufficient engagement with schools 3. Recent planning approvals show boarding accommodation can be successfully delivered under existing policies, suggesting a separate restrictive policy is unnecessary and the restrictive policy wording is unjustified and impractical 4. The policy does not adequately explain why alternative locations are unsuitable, despite examples of successful off-campus provision 5. Background paper 003 states that there is no local or national policy which is technically correct but doesn't account for paras. 20,27,100 of the NPPF.	4. The policy aims to keep accommodation near the school to reduce children being housed away from the school, which may reduce supervision and safety and increase the need to travel to lessons. 5. National policy is addressing schools, this policy is addressing boarding accommodation which are different things. Para 100 refers to collaboration and working with providers and pre-app advice – both reg.18 and 19 consultations welcomed any comments and representations 6. Worked with County Council to show we have enough supply for school provision	
States the policy is unjustified. The justification for accommodation to be adjacent is not justified.	The supporting text of the policy highlights that keeping accommodation near the school aims to reduce children being housed away from the school, which may reduce supervision and safety and increase the need to travel to lessons.	None

Chapter 3

General comments relating to Chapter 3

POLICY	Chapter 3 (whole chapter)
All respondents **supporting** policy	No representations were made in support of this policy

POLICY	Chapter 3 (whole chapter)
All respondents **raising objections** on this policy/chapter	98.4

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
This is overall sound, however, the following changes are suggested: *Care shall be taken so that the concentration on Oxford's globally important role does not inadvertently damage the wider aspects of life within the crowded city, such as the loss of entertainment venues and retail facilities, particularly such shops – specialising in supplying white-goods, electronic goods, furniture, building and DIY materials, car-and-bike accessories - as are currently only to be found within the city on the Botley Road.*	The Plan should be read as a whole and includes policies protecting cultural and community facilities, e.g., entertainment venues. The Use Classes Order enables flexibility to change between uses within Use Class E (which contains both retail and office/R&D uses). We do not consider that the suggested text is required.	None.

Balance is required, recognising the needs of the community as a whole, and not requiring journeys to be made outside the city to supply basic needs.		

Policy E1

POLICY	E1				
All respondents **supporting** policy	58.7	60.7	86.4	117.1	*118.5*
	130.4	133.4	134.3	157.7	

COMMENT SUMMARY	OFFICER RESPONSE
South Oxfordshire District Council has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Vale of White Horse District Council has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Principles behind policy are supported, especially the focus on making efficient use of employment land and protecting key employment sites. The protection and intensification of existing employment sites aligns with the NPPF and will make the best use of existing developed/ brownfield sites. The flexible approach to potentially allow the development of housing on Key Employment Sites and non-designated employment sites is also considered reasonable and appropriate given the pressures on the city to provide for both economic and residential development.	Support welcomed

West Oxfordshire District Council has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Continued support for aspects of emerging Policy E1, which considers new employment generating uses within the city centre as an acceptable location for delivering new, modernised and intensified employment floorspace.	Support welcomed
Support simplification of previous categorisation of employment sites to include only Key Employment Sites and all other employment sites. Support the identification of Oxford North within the list of Key Employment Sites.	Support welcomed
Support approach to meet Oxford's employment needs No plans at this time to deliver housing on-site. Recognise housing is a key locational consideration for companies. Also recognise and support scope for allowing some housing on employment sites provided it supports their economic function as part of Policy E1.	Support welcomed
Supports flexibility of Policy E1, which protects the most important 'key' employment sites, whilst also allowing for their intensification including complementary housing to create mixed use sites. Given the scale of the city's housing requirement, it is right that all options should be considered, including employment sites.	Support welcomed

POLICY	**E1**				
All respondents **raising objections** on this policy/chapter	40.2	47.11	57.3	59.6	69.9
	81.2	82.1	89.7	92.2	101.4
	114.1	129.5	134.14	138.15	159.8

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**

Suggest amending the initial paragraph of this policy as follows: *'All new development ~~on employment sites~~ for employment purposes …'* The effect of this change would be to make the paragraph in question applicable to employment development more broadly rather than only being applicable to allocated/existing employment sites. This clarification and amendment would ensure the policy is effective.	This phrase of Policy E1 is very carefully and deliberately worded to refer to "employment sites" rather than for "*employment purposes*". Both Key Employment Sites and existing employment sites not designated as Key Employment sites are defined in the glossary. These sites together make up what is meant by "employment sites" which are suitable locations for "employment-generating uses", as defined in the glossary (i.e., Office/R&D/Industrial/ Storage and Distribution uses). However, the city's Key Employment Sites cover a wider range of sectors providing jobs in the city than the traditional employment sectors for land-use planning purposes, which, as set out above, are defined in the plan as "employment-generating uses". Oxford's Key Employment sites include hospitals and educational institutional sites as well as traditional sites for employment generating uses. Health and education jobs in Oxford account for around half of all jobs in the city. As such, this part of the policy, ensures that development proposals across all the city's employment sites, make the best and most efficient use of land and premises, positively promote sustainable development and do not cause unacceptable environmental impacts.	None.
Identified floorspace need not in the policy. Neither is the strong pipeline of R&D reflected in policy wording. These are only identified in the supporting text.	The Employment Land Needs Assessment (Rapleys, January 2026) sets out the employment land supply position. This sets out that Oxford's pipeline supply of R&D uses exceeds the identified need for this	None.

The policy is not positively prepared. It does not provide a clear strategy for meeting employment needs in the plan period. The Council should focus on meeting all identified employment land needs within Oxford's boundary, as it is essential to sustaining the city's economic vitality and supporting its key sectors, particularly R&D, life sciences, and advanced manufacturing. We recognise the acute need for housing in Oxford. However, this should not come at the expense of employment land. By actively investigating ways to meet employment land needs within the city, including the identification of new, appropriately located sites, it ensures that Oxford can continue to support high-value job creation, attract investment, and retain its competitive edge. A higher level of protection should be afforded to existing employment sites to prevent change of use unless there is robust evidence provided to demonstrate that it is poorly performing in employment use. Wording should also be included which allows for the redevelopment of employment sites for suitable employment uses.	employment use class. The modest identified office, industrial and storage/distribution needs can be comfortably met within the existing employment land portfolio. There is no need to set out the employment land supply position in policy as this is contextual and continuously evolving. The employment strategy results in no unmet employment need for the plan period. There is currently sufficient space and opportunity on Oxford's existing employment sites to meet the identified needs for the city. Accordingly, no new land for employment-generating uses has been allocated. Conversely, Oxford is unable to meet its housing standard method housing need (NPPF, December 2024). Accordingly, the plan's employment strategy supports housing delivery while at the same time ensuring that Oxford can attract investment and retain its competitive edge. All employment sites were assessed (see background paper 4A – Key Employment Site methodology. Those sites that performed well were designated as "Key Employment Sites". The other "existing employment sites not designated as Key Employment Sites" were poorly performing. Given the identified employment land needs for Oxford can be met through development/ redevelopment of the city's Key Employment Sites, there is no need to	

	introduce a policy requirement to prevent their change of use. Wording already exists in the policy in relation to the redevelopment of employment sites for suitable employment uses.	
The Plan's employment strategy promotes high value economic growth in R&D and knowledge sectors, but by setting an industrial floorspace need of "0 sqm" and only 46,086 sqm for storage and distribution, it offers very limited support for sectors such as manufacturing, small scale industrial services, warehousing and logistics, all of which provide a broader spread of job types and skill levels. It is not apparent from the Plan how the evidence base has: - assessed long term demand for urban industrial and logistics land within Oxford; - evaluated the implications of allowing the "complete loss" of some existing employment sites to housing, as explicitly envisaged by the strategy; and - considered the need to retain a diverse stock of employment sites, including those suitable for manufacturing, servicing, small workshops and last mile logistics.	The Plan's employment strategy is underpinned by evidence. The Oxford Employment Land Needs Assessment (Rapleys, January 2026) (hereafter "ELNA") provides a robust, PPG compliant assessment of Oxford's employment land floorspace needs for the plan period. A number of existing site allocations specifically include B2 (Industrial) and B8 (Storage/ Distribution) uses as named potential primary uses. The employment forecasts in the ELNA are for the twenty-year plan period. The "complete loss" of some of the city's employment sites to other uses, including housing only applies to "existing employment sites not designated as Key Employment Sites". These sites are generally smaller, poorly performing, employment sites that are not well-located. Given the plan's focus is to deliver new homes (for which Oxford has an identified unmet need (Standard Method, NPPF, December 2024)), it is important that the employment strategy supports the delivery of new homes in the city.	None

Without this clarity, it is difficult to conclude that the quantum and distribution of floorspace by sector are fully justified in line with NPPF para 31. If urban industrial and "last mile logistics" land is displaced out of Oxford: - service and delivery trips may need to originate from farther afield, increasing travel distances, vehicle kilometres and associated emissions; - construction, maintenance and repair industries may face longer journeys to jobs in the city; - local SMEs may struggle to find appropriately priced and located premises, ultimately leading to a loss of services and facilities in the city, and requiring residents to make longer journeys to reach the facilities and services they need. This could undermine both economic resilience and transport sustainability, given the important role of well located industrial and logistics land in supporting shorter supply chains and more efficient urban servicing, and is not fully addressed within the Plan's employment or transport strategy. By identifying 345,004 sqm of additional R&D floorspace need, 46,086 sqm of	The Key Employment Sites (i.e., those protected and retained in an employment-generating use), include a range of sites (not just R&D). A range of Key Employment Sites in the south of the city have been designated, in the vicinity of MINI Plant Oxford. These represent a diverse stock of employment sites and include small workshops, light industrial units, manufacturing, and small-scale storage and distribution uses. All of the issues discussed by this respondent are addressed in the plan's supporting evidence base (ELNA, Background papers, etc.). There is no need for the Plan to simply repeat the PPG compliant assessment of employment floorspace need which is eloquently articulated in the ELNA. As set out above, the plan protects a wide range of Key Employment Sites across a broad range of sectors to support economic diversity in the city.	

storage/distribution need and 0 sqm of industrial floorspace need, and by tightly constraining new B8 uses and allowing the complete loss of some existing employment sites, the Plan risks: - reducing the diversity of employment land within the city; - limiting the availability of sites suitable for industrial, servicing and logistics activities; and - narrowing the range of employment opportunities available locally, particularly for those not employed in high skill knowledge sectors. To better accord with the NPPF's requirements for evidence based, balanced and resilient economic planning, it is suggested that the Plan should: - more clearly demonstrate, with reference in the Plan text to the evidence base, how industrial and logistics needs have been assessed and why a 0 sqm industrial need is appropriate; - identify how sufficient land and policy support will be maintained for urban industrial, servicing and last mile logistics uses, including smaller sites and SMEs; and		

- explain how the substantial R&D pipeline and proposed additional R&D floorspace have been balanced against the needs of other sectors and the objective of providing a wide range of accessible employment opportunities for local residents.		
Fundamental concerns about significant imbalance between jobs (high) and economically active residents (much lower). This imbalanced has led to many problems, including high levels of commuting, traffic congestion, a shortage of housing and very high housing costs which exacerbate inequalities. The local plan strategy of *meeting all identified employment needs arising within the city while exporting its unmet housing needs to greenfield sites in neighbouring districts* is not sustainable and is not an appropriate strategy. The plan claims to have a flexible approach to supporting housing delivery on employment sites however it appears very reluctant and is highly constrained. It is likely that the current jobs: housing imbalance will increase over the plan period, encouraging car use, worsening traffic congestion, road safety and environmental problems. It will store up problems for the future with no effective ways of solving them. The strategy is	National Planning Policy (para. 11a) sets out that for plan-making, the application of the presumption in favour of sustainable development means that plans should promote a sustainable pattern of development that seeks to meet the development needs of their area. This is backed by Para.20 of the Framework which sets out that strategic policies (i.e., Policy E1 – as set out in Appendix 1.2 of the Oxford Local Plan 2045 Proposed Submission Document), should make sufficient provision (i.e., to meet the identified needs for), a range of uses, including employment. Given that one of the tests of soundness is "consistency with national policy", the plan should at the very least attempt to meet the identified needs for all the NPPF Para. 20 uses, within Oxford's tightly drawn administrative boundary. The plan's strategy does not identify new land as site allocations for employment uses but instead focuses new employment-generating uses towards existing employment sites. This enables both investment and the delivery of	None

not consistent with NPPF, para 111 a) as it fails to support an appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. Neither is it consistent with NPPF, para 8 on sustainable development, which seeks a range of homes to meet the needs of present and future generations. We consider the local plan is skewed towards encouraging employment and fails to give sufficient priority to providing housing, particularly much needed social housing for rent. It should be modified to give greater priority to providing housing, for example, by i. removing the objective to provide the conditions for Oxford to meet all identified employment needs arising within the city to 2045 - an additional 412,460m2 of employment generating floorspace. This is not necessary or appropriate given the potential for very significant job increases on land in and close to the city. The Oxford Growth Commission's Interim Report, for example, gives an indicative job potential of 25,000 in Oxford Central and West End, 15,000 around the Cowley branch line, 8,000 around Oxford, Kidlington and Parkway Station ii. reducing the number of key employment sites in Appendix 3	active travel and public transport infrastructure improvements to be realised. The additional combination of the County Council's "Core Transport schemes" - a suite of demand management measures and the Local Plan 2045's firm non-residential car parking standards (the starting point of which is to seek no increase in car parking at non-residential sites, and which seek a reduction in car parking where non-residential sites are located in accessible locations), means that the plan's strategy is consistent with paragraph 111a). A detailed analysis of the possible strategies for the Oxford Local Plan 2045 is set out in the Sustainability Appraisal. The Plan's focus is on housing delivery. The Plan proposes new sites for housing, and in the highly accessible locations of the city and district centres, the plan proposes a minimum density of 100dph. Addressing each of the numbered points in turn: i. The plan's employment is primarily focused on brownfield and existing mixed-use site allocations which include both housing and employment-generating uses. We are unable to "remove the objective" to seek to meet the identified employment needs for the city as this would be inconsistent with national policy. ii. The Key Employment Sites in the plan (which include four of the main hospitals in the city)	

iii. making some site-specific allocations for housing on all or part of current employment sites – this could include, for example, land at the ARC site, the Science Park, and in Oxford's West End, Osney Mead and Botley Road areas iv. Amending policy E1 which appears to support the loss of employment floorspace to support housing delivery, but on key employment sites the loss must be fully justified, the employment use maintained and the number of jobs retained (criteria f and g). This is too inflexible and given the jobs:housing imbalance is not appropriate v. similarly, for other (i.e. non key) employment sites, E1f) indicates that the employment use should be maintained. This is inflexible, inappropriate and should be deleted vi. amending policy S1e) which indicates that housing is only a priority away from current employment sies vii. removing employment as an acceptable use at Slade House (NHS) and part of Thornhill Park as there are no business uses on the sites and they do not meet the criteria for new employment development viii. naming residential as an acceptable use on the Ozone Leisure Park (SPS13) and the Unipart site (SPS17) particularly if redeveloped in association with the Northfield strategic housing allocation in SODC's local plan ix. increasing the minimum number of homes to be provided; on some sites it seems very low –	have all been assessed using the methodology outlined in Background Paper 4a. These sites are all important to the city. iii. Where landowners have expressed an immediate interest in delivering housing on their sites, housing numbers have been included in the respective site allocation policies, i.e., Osney Mead and site allocations within Oxford's West End. The Strategic Housing Land Availability Assessment (SHLAA) provides further details. iv. We consider that the approach to protecting existing jobs on the city's Key Employment Sites, and ensuring the employment use is maintained at those sites is appropriate and supports the plan's focus on housing. The permissive approach to residential on Key Employment Sites therefore enables new homes to come forward, without jeopardising, amongst other things, the continued operation of existing businesses. v. Criteria E1f) does not apply to existing employment sites not designated as Key Employment Sites. There is a typo in the policy. The final sentence of the second paragraph under the heading "*Loss of employment floorspace and the use of employment sites to support housing delivery",* should refer to criteria h) to m). This typo has been picked up and a modification has been proposed to refer to the correct policy criteria.	

for example Ruskin Field has a minimum of 28 homes on 3.5 ha and is the only use proposed.	vi. A modification has been proposed to Policy S1e) to clarify that the plan's focus is on housing delivery. See Schedule of Main Modifications for further details. vii. Both these site allocations either contain, or previously contained employment uses, as such it is appropriate that employment uses are retained on each site. viii. See response iii) above. ix. Individual site capacities for each site have been assessed and calculated based on the specific circumstances for each site. The numbers are a minimum, so more can be provided by landowners/ developers, subject to meeting other policy requirements in the plan.	
The policy, as drafted, is ineffective and too restrictive. Criteria f and g of this policy need to be deleted. Respondent has repeatedly called for some development on various sites listed as Key Employment Sites, many of which have sat empty for decades. The worst examples, being the Osney Industrial Estate and the Unipart site but there are many others. For example, there are still empty sites available on the old British Leyland site at ARC Oxford dating from the 1990's and representing now 30 years of being effectively brownfield sites. If there is no real expectation that these sites will be actively developed then protecting them as Employment sites makes no sense. The City	We consider that the approach to protecting existing jobs on the city's Key Employment Sites, and ensuring the employment use is maintained at those sites is appropriate and supports the plan's focus on housing. The permissive approach to residential on Key Employment Sites therefore enables new homes to come forward, without jeopardising, amongst other things, the continued operation of existing businesses. It is worth clarifying that, while there are some vacant buildings at Osney Mead (e.g., Alden Press, it is an active industrial estate which is home to a variety of existing businesses, as well as an EA depot and some academic institutional buildings. Similarly, a number of businesses	None

Council have singularly failed to deal with this issue claiming quite wrongly that Oxford is full, ignoring Osney Mead and the many other vacant sites in Oxford. Policy E1 should state that: "if a site or part thereof has not been used for substantive employment purposes for a period of 10 years or more then it shall not be subject to the Proposals involving housing listed in the Employment strategy and be subject to normal planning requirements for housing development. Car or commercial vehicle storage/ parking would not be regarded as substantive employment. In relation to smaller developments (formerly Category 3 sites) the suggested proposals should not apply." Further owners should pay enhanced business rates if they fail to redevelop vacant sites.	operate out of the Unipart site, including offices used by the NHS and the Unipart Group. The other cited example is ARC Oxford. All vacant plots at ARC Oxford either now benefit from planning permission or have a planning application under consideration. We do not agree with the proposed modification to the policy as any proposals would come from the landowners/developers of a site. Local planning policy is not able to alter business rates.	
Policy E1 appears to support the loss of employment floorspace to support housing delivery, but on key employment sites the loss must be fully justified, the employment use maintained and the number of jobs retained (criteria f and g). This is too inflexible and given the jobs:housing imbalance is not appropriate similarly, for other (i.e. non key) employment sites, E1f) indicates that the employment use should be maintained. This is inflexible, inappropriate and should be deleted.	We consider that the approach to protecting existing jobs on the city's Key Employment Sites and ensuring the employment use is maintained at those sites is appropriate and supports the plan's focus on housing. The permissive approach to residential on Key Employment Sites enables new homes to come forward, without jeopardising the continued operation of existing businesses.	None

This policy excludes housing from many designated employment sites and makes it extremely difficult to include housing in the others. It deliberately creates 'unmet' housing need when there are many empty employment sites which cannot be used for much needed housing. This creates a high job vacancy rate within Oxford and an increase in traffic congestion above its current intolerable level with the increase in commuting into Oxford. Development sites should not be zoned for employment alone. It makes sense to mix housing on employment sites, which is sustainable so people can walk to work. Oxford City Council have been very unfair to local people needing housing within the City and the Districts receiving their alleged 'unmet' housing need that Oxford City has deliberately created, The Oxford Business Park on the site where Morris Motors (now BMW Mini works) used to be, was developed as a business park in approximately 1980s and still has empty plots which have not been developed. These could and should have been used for much needed housing. The site itself is having many business premises demolished and rebuilt. This causes significant and unnecessary carbon emissions	The policy does not exclude housing from designated Key Employment Sites. It allows the loss of *existing employment sites not designated as employment sites* to other uses, while supporting proposals for housing subject to certain criteria being met to ensure that any residential development proposed creates an acceptable living environment for future occupiers. The Plan seeks to meet all identified needs as established through paras 11a, and 20 of the Framework (Dec,2024). The plan's employment strategy enables the city to meet its employment needs at identified Key Employment Sites in the city. At accessible sites in the city and district centres, site allocations include both minimum housing numbers and suitable employment-generating uses (i.e., office/ R&D/etc). Oxford City Council is not able to meet its identified standard method housing need (NPPF, Dec 2024). As such, the City Council continues to work with neighbouring district councils to seek to support and deliver the city's identified housing need to 2045. This is in line with national policy. All vacant plots at the former Cowley Motor Works (ARC Oxford) either now benefit from	None

which contributes to climate change. It is a disgrace and very wasteful.	planning permission or have a planning application under consideration.	
Historic England has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Cherwell District Council has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Do not support proposed employment strategy. It is not positive, justified, and will not be effective, due to its failure to identify clear requirements for employment land and how or where needs will be met. The policy, based on a more positive and effective employment land strategy, is required. It should quantify employment land and floorspace requirements, express the spatial priorities where provision can be made and ensure flexibility for the market and growth in current and emerging sectors. The approach for supporting employment growth must be aspirational and flexible and positively support and encourage the	The Oxford Employment Land Needs Assessment (ELNA) produced by Rapleys includes a comprehensive supply-side assessment which looks at extant permissions and also considers the planning pipeline of current applications being considered at October 2025. This supply-side assessment shows that the identified floorspace needs for office; R&D; industrial; and; warehousing uses, can be comfortably accommodated within the city's current employment land portfolio (focusing new employment-generating uses on the city's Key Employment Sites, and on employment sites within the city and district centres).	None

commitment and future investment into Oxfordshire that will be mobilised through the Oxfordshire Growth Commission. The Local Plan, in looking forward to 2045, must create the conditions to support, not constrain economic growth. As stated in relation to housing requirement – collaborative working across boundaries is critical to securing and supporting this process.	The supporting text to Policy E1 already quantifies the employment floorspace need. Given the plan can meet its employment needs primarily through modernisation and intensification of brownfield land, there is no reason to quantify the employment floorspace need as a land requirement. No "new" land is required to meet the city's employment needs. The policy does express the spatial priorities where provision of employment land can be made. All employment site allocations (and mixed-use site allocations containing employment uses) have been drafted in consultation with landowners/site promoters/developers to ensure a suitable range of uses for each site, has created (and is sustaining) flexibility for the market and growth in both current and emerging sectors.	
Policy E1 is confusing and contradictory. It risks undermining the efficient use of land that the Local Plan otherwise strongly promotes. Re: existing employment sites not designated as Key Employment Sites, the requirement in Policy E1 in relation to redevelopment and intensification is appropriate and aligns with the plan's wider objectives regarding optimisation of land and supporting economic growth. However, no justification is provided for requiring a sequential assessment in circumstances where a proposal is simply seeking to intensify an existing employment site, nor are any exemptions provided for sites	The Plan's employment strategy articulates paragraph 86a) of the Framework (December 2024) and sets a clear economic vision and strategy which positively and proactively encourages economic growth by supporting new employment-generating uses in the city and district centres and across the city's network of Key Employment sites. The city's Key Employment Sites were established using the methodology set out in Background Paper 4a – Key Employment Site Methodology. Accordingly, existing employment sites that are neither located in the city or district centres,	To clarify the position for Policy SPS13 and the following linked site allocation policies (Policy SPS7 and SPS11), we propose the following modifications: **Policy SPS13: Ozone Leisure Park and Minchery Farmhouse** Amend the first paragraph of the Policy SPS13 as follows: *Planning permission will be granted for mixed-use development within existing lawful Use Class E and with replacement community*

that are allocated for employment-related development within the Local Plan. This creates a clear internal conflict. On the one hand, the policy requires intensification of existing employment sites. On the other, it introduces a sequential test that may prevent or delay that very intensification, even in locations expressly allocated for employment use in the Plan. For example, the intensification of employment floorspace at the Ozone Leisure Park, despite being an allocated site, would still trigger the requirement for a sequential test, introducing an unnecessary procedural hurdle that is inconsistent with the Plan's objective of maximising efficient land use. It is therefore strongly encouraged that the wording of this policy be reconsidered to provide greater clarity and a clearer policy direction that is more conducive to the efficient use and optimisation of existing employment sites. Policy E1 states that proposals for employment generating uses outside of designated Key Employment Sites, City and District Centres and existing employment sites not designated as Key Employment Sites will be refused. However, Policies SPS7 and SPS11 both allow employment-related uses on site. This presents an internal inconsistency within the Reg 19 which could prevent the effective implementation of Policies SPS7 and SPS11. This internal inconsistency risks rendering the	nor are Key Employment Sites (some of which benefit from a site allocation), should undertake a sequential test for the introduction of additional employment-generating uses. Policy E1 sets out that the sequential test would apply to new employment-generating uses on sites in lawful use class for the proposed employment use class). Policy E1 also allows the loss of any employment site not designated as a Key Employment site, to other uses. The site in question is currently, as the name suggests, a Leisure Park, which contains a Bowling Alley, Cinema Complex (Sui Gen), and other Use Class E leisure-related uses. Although this site does benefit from a site allocation policy (Policy SPS13 Ozone Leisure Park and Minchery Farm), the site itself is neither a Key Employment site nor located within the city or district centres. The inclusion of the list of "acceptable uses" within the site allocation policy simply reflects the permitted development rights associated with uses within Use Class E. Where site allocations that are not located in the city or district centres, nor are listed as Key Employment Sites highlight that a particular employment-generating use is an acceptable use this needs to be read in conjuction with Policy E1.	*leisure/sui generis uses. Acceptable uses on the site include:* • *Research and development (in accordance with **Policy E1**)* • *Other Use Class E employment uses (in accordance with **Policy E1**)* • *Commercial leisure* • *Community and cultural facilities* • *Replacement hotel* **Policy SPS7: Kassam Stadium** Amend the first paragraph of Policy SPS7 as follows: *Planning permission will be granted for residential-led development and public open space on the Kassam Stadium site. The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected. There is also a precedent for employment-related uses, so these will be acceptable as a secondary use on the site (in accordance with **Policy E1**).* **Policy SPS11: Overflow Car Park at Kassam Stadium** Amend the second sentence of the first paragraph of the policy as follows: *Planning permission will be granted for residential-led development and public open*

allocation policies ineffective. Policy E1 should therefore explicitly recognise that employment uses are acceptable where supported by site specific allocation policies.	Two other sites are linked to site allocation policy SPS13. These are site allocation policies SPS7 and SPS11. The plan takes a flexible approach to the delivery of uses across the sites providing the minimum number of homes is delivered. Ac It is appropriate that Policy E1 ensures that sites regenerated for employment-generating uses, that do not align with the plan's strategy, should ensure that their intensification does not affect the vitality and viability of the city and/or district centres by drawing people away from them, towards less accessible locations. As such it is appropriate that a sequential test be carried out for the intensification of existing employment sites not designated as Key Employment Sites (and sites in lawful use class for the proposed employment use class). We consider that Policy E1 is clear. Policy E1 supports the modernisation and intensification of employment generating uses at Key Employment Sites, and at employment sites located within the city and district centres. As set out above, there are a variety of reasons for this, including that the city's Key Employment Sites and the city and district centres represent the main opportunity within Oxford for meeting Oxford's identified employment needs, which, as set out in the Employment Land Needs	*space on the Overflow Car Park at Kassam Stadium site. The minimum number of new homes to be delivered is 100. Other complementary uses will be considered on their merits. This site is linked to SPS7 and SPS13, and a flexible approach will be taken to how the required uses are spread across the sites (in accordance with **Policy E1** where applicable uses are proposed), but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall.*

	Assessment, can be accommodated at these sites. This is the plan's clear economic vision and strategy, are clear and support the plan's overarching strategy to focus on housing delivery. However, to ensure that the approach is	
The policy is unjustified as there is no obligation for extra employment to provide extra housing, only permission to do so. The relentless expansion of the OUHT, the Universities and associated research centres is the primary driver of housing need in the city, but E1 permits expansion with no contribution to housing. If a business wants to downsize and allocate space for housing, this is specifically prohibited, which is unjustified. Work from Home leads to reduced need for space with different workgroups having office days on different days of the week. This is an economic decision taken by the employer, OCC has no role in this.	Policy E1 establishes a permissive approach to housing delivery across the city's existing employment site network. This both enables an element of housing delivery at the city's Key Employment Sites, while supporting the complete loss of the city's less well located, poorly performing, and often smaller employment sites to housing. The policy also includes specific criteria to ensure good quality residential development comes forward.	None
A mechanism should be provided in the Local Plan to review the categorisation of employment sites on a regular basis and update the list within Appendix 3.1. Policy E1 is unnecessarily restricted in scope regarding the types of employment generating which should be allowed within Key Employment Sites. This restriction comes from the current definition of 'Employment Generating Uses' in the Glossary. For example.	We consider that the most appropriate time to review the employment site categorisation is through the preparation of the Local Plan itself. The "Key Employment Sites" are listed within the Plan (Appendix 3.1) and mapped on the Policies Map. We do not consider that Policy E1 is unnecessarily restricted in scope. Policy E1 sets out the strategy for meeting the city's identified needs for, what are described as, in planning	None

the Glossary definition does not include the following uses which can generate significant numbers of new jobs: retail, financial / professional services, indoor sport / recreation, medical / health services, creches / nurseries (Use Classes E(a), E(c), E(d), E(e) and E(f)); and hotels (Use Class C). Amend Policy E1 as follows: Add wording which includes a mechanism to change the category of employment sites outside of a review of the Local Plan. This review should be undertaken regularly and the list of Key Employment Sites in Appendix 3.1 updated accordingly. Amend the Glossary to include additional employment generating uses that are suitable in a Key Employment Sites: "Employment generating uses are referred to in planning terms as employment floorspace or employment land. Employment generating uses include the sectors that make up the following Use Classes: - Use Class EG(i): Office - Use Class EG(ii): Research and Development (R&D) - Use Class EG(iii): Light Industrial - Use Class B2: General Industrial - Use Class B8: Warehousing, Storage and Distribution - <u>**Use Classes E(a): Retail</u>	terms, "employment" land uses (i.e., Use Classes Eg(i-iii), B2 and B8). The term "employment-generating uses" has been carefully defined in the glossary of the plan to reflect this. The plan includes different spatial approaches for, Hotel and Short Stay accommodation, as well as for Retail and Leisure uses, the identified needs of which have all been assessed and strategies to support the associated delivery of these needs have been addressed in separate policies (e.g., Policy E5 – Hotel and short stay accommodation). Policy E1 enables the loss of floorspace for employment-generating uses at Key Employment Sites providing specific criteria are met.	

- Use Classes E(c): Financial / professional services - Use Classes E(d): Indoor sport / recreation - Use Classes E(e): Medical / health services - Use Classes E(f): Creches / nurseries - Use Class C: Hotels**"		

Policy E2

POLICY	E2
All respondents **supporting** policy	No representations were made in support of this policy

POLICY	E2				
All respondents **raising objections** on this policy/chapter	92.3	117.2			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Cherwell District Council has made a representation relating to Policy E2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

The draft policy wording within Regulation 18 Consultation Draft restricted new or expanded warehousing and storage uses to circumstances where they were 'essential to support the operational requirements of that Key Employment Site.' The Regulation 19 Submission Draft now seeks to allow Class B8 (Storage or Distribution) uses within existing Key Employment Sites, subject to a set criteria. Despite the amendment, Policy E2 remains restrictive and does not reflect potential for a diverse range of significant employment uses. It is, however, noted that whilst Policy E2 continues to limit Class B8 uses at Key Employment Sites, the 'Unipart Site' (which is dealt with under Policy SPS17) doesn't limit Class B8 uses. Given the nature and scale of available land at the 'Unipart Site' this lack of restriction is welcomed.	Policy E2 is aligned with the overarching employment strategy (Policy E1) which does not seek to identify new land for site allocations for employment-generating uses. As B8 uses have particular requirements, Policy E2 introduces a set of criteria which include requirements to ensure B8 uses are appropriately located in the city. Not all Key Employment Sites benefit from site allocation policies and as such, where B8 uses are required by existing businesses to ensure their continued operation, they would be supported. This is because Key Employment Sites include a wide variety of sites suitable for smaller scale B8 uses. The Employment Land Needs Assessment (ELNA) (Rapleys, January 2026) highlights that the modest warehousing requirements for the plan period can be accommodated within the city's existing employment land portfolio. Accordingly, on site allocations which specifically reference B8 uses, these uses can be brought forward "as part of a wider agreed masterplan". As the city's modest B8 needs can be delivered in this way, we consider Policy E2 to be appropriate.	None.

Policy E3

POLICY	E3		
All respondents **supporting** policy	118.6	159.21	157.8 and 157.18

COMMENT SUMMARY	OFFICER RESPONSE
West Oxfordshire District Council has made a representation relating to Policy E2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
ONV supports approach to CEPP's and has established such Plans at Oxford North with great success. ONV supports the need for a range of sizes of workspace in Oxford to meet the demands of smaller businesses. ONV is delivering this at Oxford North to meet a range of needs, including incubator space and smaller co-working areas.	Support noted.
The increase in the size of the floorspace limits from 1,000sqm to 5,000sqm is welcomed as it will not unduly impact upon more modest schemes.	Support noted.

POLICY	E3				
All respondents **raising objections** on this policy/chapter	40.3	51.2	59.7	77.1	117.3
	157.8 and 157.18				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Policy is not justified. It applies a blanket requirement for CEPPs without sufficient evidence that such plans are necessary for all qualifying developments. In practice, such obligations are typically secured through planning obligations on a site-by-site basis where they meet the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010. A more flexible approach that allows the requirement to be considered on a case-by-case basis through Section 106 agreements would ensure that obligations remain proportionate and directly related to the development.	The policy as worded is considered to be suitably flexible. Where CEPPs are expected to be provided, the policy introduces an expectation to demonstrate consideration of all the measures listed. The absence of policy targets enables flexibility to cater for a wide range of development types. The policy supports a flexible approach. The criteria should be considered as an "a la carte" menu of choices, providing a flexible approach to policy compliance through demonstrating consideration of each of the critieria.	None.
Principle supported however policy is vague and difficult to understand what the expectations are. There are no defined targets for the amount of jobs or apprenticeships that would be expected to be delivered. The policy also asks for all criteria to be considered however some will not be able to be covered as it will depend on the context of a planning application.	The policy as worded is considered to be suitably flexible. Where CEPPs are expected to be provided, the policy introduces an expectation to demonstrate consideration of all the measures listed. The absence of policy targets enables flexibility to cater for a wide range of development types. It may well be that not all criteria are applicable for every planning application. It is for the applicant to demonstrate that they	None.

Further, paying all employees the Oxford Living Wage is right as an aspiration but should not be a policy expectation as part of a planning application. Proposed modifications: Amend the first sentence of the first paragraph of the policy as follows: *Planning ~~permission will only be granted for proposals of~~ applications should be supported by CEPP for 50 or more dwellings or 5,000 sqm of GIA…* Amend the final sentence of the first paragraph of the policy as follows: CEPPs should consider the following criteria where applicable: ~~will be expected to demonstrate consideration of all the following measures~~: Delete criteria f) and g) entirely and encourage the Oxford Living Wage rather than making it a requirement.	have considered all the measures outlined below. In relation to criteria f) and g), again the policy expectation is that the applicant demonstrates consideration of paying all employees (f), and using contractors (g), who commit to paying the Oxford Living Wage. The policy supports a flexible approach. The criteria should be considered as an "a la carte" menu of choices, providing a flexible approach to policy compliance through demonstrating consideration of each of the critieria. We do not accept these changes.	
Oxford City Council's Corporate Strategy for 2024-28 commits to "Increase the number of people paid the Oxford Living Wage to improve the minimum standard of living". The Local Plan should therefore require developers to play an important role in ensuring that the Oxford Living Wage is not only paid to workers employed during the construction phase, but	It is the responsibility of business owners to choose to become an Oxford Living Wage Employer. Policy E3 goes as far as it can in relation to ensuring control of elements of a scheme that relate to the granting of a planning permission.	None.

also those in the end user phase (i.e. those who go on to work on the site in available units once they have been constructed). Add new bullet point: "Implementation of a Living Wage Zone, securing payment of the Oxford Living Wage to all directly and indirectly paid workers who work on the site following construction"	As such, we cannot accept the proposed modification.	
It should explicitly state that construction jobs means not just the jobs required for the construction itself but also all the associated consultancy that is required to get a building on site and monitor it for health and safety and build quality. And that the best way to provide apprenticeships and training, as well as the best way to sustain the local economy is to engage local businesses, both construction firms and consultancy firms, who should be there long after the individual construction job has finished. I propose the policy is amended to specifically state: a) Securing construction jobs, including the associated consultancy roles, for local residents and businesses; b) Providing construction and consultancy apprenticeships and/or training opportunities for local residents in local businesses;	Policy E3 goes as far as it can in relation to ensuring control of elements of a scheme that relate to the granting of a planning permission. As such, we cannot accept the proposed modification.	None.

The threshold for non-residential floorspace has increased which is supported, however the policy should allow more flexibility and not make Community Employment and Procurement Plans a policy requirement for all major development proposals, as previously suggested. This will provide flexibility and ensure the policy is practicable for developers and viability. Therefore, it is recommended that the policy is amended to encourage, not mandatory require such Plans. This will provide flexibility and ensure the policy is practicable for developers and viability.	Suggest that the amendment is not required given the flexible nature of the policy which introduces an expectation for CEEPs to demonstrate consideration of the policy measures.	None.
Requiring affordable workspace to be delivered on Key Employment Sites could be counterproductive in that it will impact the overall scheme viability of workspace delivery, exacerbate supply demand imbalance and hence push up rents. Furthermore, the approach in the LP45 to seek affordable workspace on the Key Employment Sites (the most productive and important to the local, regional and national economy) runs counter to the ability to seek more affordable space elsewhere. In other areas, principally London Boroughs, new affordable workspace has been delivered most effectively via low-cost reuse and/or refurbishment of existing buildings to produce workspace at lower rents.	Policy E3 does not prevent the delivery of affordable workspaces on non-key employment sites. These comments also seem to relate to Policy E4: The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies.	None.

This is especially relevant to non-Key Employment sites.	The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	

Policy E4

POLICY	E4	
All respondents **supporting** policy	*87.3*	*157.8*

COMMENT SUMMARY	OFFICER RESPONSE
Oxford University Developments (OUD) has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
ONV supports the need for a range of sizes of workspace in Oxford to meet the demands of smaller businesses. It is	Support noted.

delivering this at Oxford North to meet a range of needs, including incubator space and smaller co-working areas.	

POLICY	E4				
All respondents **raising objections** on this policy/chapter	40.4	86.5	114.5	117.4	129.6
	130.5	134.4	137.3	138.16	157.18

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
It is essential that affordable workspace requirements are clearly defined, viable, and do not unduly impact the deliverability of a scheme. The policy should set out that affordable workspace requirements will be subject to viability considerations and applied flexibly where a development is already delivering other significant planning obligations. Without such flexibility, the policy risks undermining the deliverability of employment-led development and therefore fails the test of effectiveness.	The policy itself requires an Affordable Workspace Strategy to be produced. The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study have considered the viability implications of bringing forward different amounts of affordable workspace at a range of rent reductions. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces	None.

	Strategy), to ensure that schemes remain deliverable.	
Plan includes no reference or definition to what these 'alternative' rent models may comprise or what is considered a 'discounted' rent. Not clear what type and level of detail will be considered acceptable in respect to the size, marketing, servicing and management for affordable workspace. In addition, it is unclear which companies would qualify for affordable workspace, particularly at SME level, and what percentage of floorspace would be expected to be delivered as affordable. Clarification on these matters is critical to understand how the policy will operate in practice and the cost of the policy on future developments. Suggested change: Amend the affordable workspace definition contained in the glossary to provide greater clarity on what constitutes start-up and early-stage businesses or introduce a new definition for SMEs to enable greater clarity on who would qualify for affordable workspace.	The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies. The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable. We consider that the glossary definition is sufficient.	None.
The Local Plan provides no justification for the selected list of sites in Policy E4, nor does it	The Employment and Inclusive Economy Background Paper published at the Reg. 19	None.

offer a clear definition of what constitutes "affordable workspace". This lack of clarity makes it challenging for developers to understand the potential implications of this policy at the outset of site acquisition or development planning. The Viability Appraisal models several affordable workspace scenarios. It indicates that providing 10% of floorspace at a 25% discount to market rent (in perpetuity) could reduce residual land values by around 4–6%, while a 50% discount could reduce values by 8–11%. The Appraisal further notes that "the impact may be more significant when applied to developments that are only marginally viable and a flexible approach may be required in these cases". In the context of our broader concerns about the cumulative impact of the Local Plan's requirements, as outlined under Policy S4, Pioneer is concerned that the current drafting of Policy E4 introduces substantial uncertainty. Without a clearer indication of the level of discount sought or the proportion of floorspace likely to be required, it is difficult for developers to assess viability accurately. Greater certainty is required regarding the scope, scale, and financial implications of the policy so that development proposals can be planned on an informed basis. Without clearer	consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies. The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	

guidance, there is a risk that Policy E4 could undermine deliverability, particularly for schemes with already constrained viability or those facing multiple cumulative policy burdens, including recently increased CIL charges for R&D uses.		
Since the Regulation 18 Consultation Draft the wording of Policy E4 remains mostly unchanged. However, the inclusion of the wording 'Affordable workspace that is brought forward in accordance with an agreed site-wide masterplan is encouraged', is supported as it promotes the delivery of affordable workspace where appropriate. The policy lacks clarity on how the requirements would apply to manufacturing / research units, and logistics units for sites like Unipart. This needs to be addressed still as it is difficult for manufacturing / logistic units to integrate affordable workspaces (unlike other uses such as office space). Policy E4 needs to provide more clarity on specific uses providing affordable workspaces.	The policy is clear that it applies to "employment-generating uses". These are defined in the glossary. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	None.
The policy does not provide a definition of affordable workspace nor a method for establishing the quantum of affordable workspace to be provided. This does not respond the finding in the Reg 19 Viability Assessment that a flexible approach to	The definition of affordable workspaces is set out in the glossary. The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at	None.

the scope of the discount may be required to ensure the viability of some developments. There is also an inconsistency with Policy H3 as E4 does not establish an approach to affordable housing contributions on non-residential uses where a proportion of that use is required to be rented at below market rate. The Council should clarify its requirements regarding affordable workspace provision on mixed use sites such that it can be confirmed this policy is justified. To be found sound and justified by the available evidence base, the policy should confirm that the level and form of provision will be determined through viability testing at application stage.	rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies. The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	
Affordable workspace has a significant impact on deliverability and is a core and fundamental consideration in terms of development feasibility and deliverability. It is important for OCC to recognise the cumulative impact of all of the combined policies that would apply to landowners / developers such as Nuffield College who are seeking to bring forward major and large scale	The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies.	None.

employment generating proposals to the City. As stated, when all draft policies are combined, it makes for a highly challenged position to enable deliverable development to come forward. Whilst the NPPF seeks for Plans to be aspirational, it also seeks for them to be prepared positively, in a way that they are deliverable. It is considered that this balance has not yet been struck when considering the draft Plan as a whole. This is apparent when reviewed against further commentary and request for amendments.	The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	
Do not support this draft policy. It is not supported by national policy. No evidence to suggest incorporating an affordable workspace strategy could be viable. No assessment/ consideration of potential cumulative impacts of an affordable workspace strategy alongside CIL liability and other planning obligations on the viability of such schemes. Such an onerous requirement would serve to frustrate schemes from coming forward that would otherwise bring significant economic and social benefits to the local community,	The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies. The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable	None.

including the provision of new employment opportunities for local people. It is therefore EIT's position to not support this draft policy unless the Council is able to demonstrate a robust assessment of the impact of an affordable workspace strategy on a scheme's viability and which concludes positively.	Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	
Waffle. Ineffective, as unclear how a larger company should be expected to support a smaller rival, as policy that only included social enterprises justified, seems to be too much interference in normal market operation.	The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	None.

Policy E5

POLICY	E5
All respondents **supporting** policy	159.22

COMMENT SUMMARY	OFFICER RESPONSE
Tourism is important to the economy of Oxford, in particular the City Centre. ChCh is a major tourist destination and as such it is important that tourist and short stay accommodation is provided to support this and maximise the length of time visitors stay in Oxford. As such ChCh supports this policy.	Support noted.

POLICY	E5			
All respondents **raising objections** on this policy/chapter	78.7	128.2	134.5	139.6

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
NPPF requires “main town centre uses” to be located in town centres, then in edge of centre locations. Only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. Hotels are identified as ‘main town centre uses’. Policy E5 is not consistent with with national policy. It does not set out a sequential approach. The evidence base has not applied a sequential test to confirm that out-of-centre sites, along the main arterial roads, are required.	The evidence base (Hotels Study) establishes that there are more bedspaces needed over the plan period than are likely to be able to be accommodated within the city and district centres. As such, arterial routes, all of which have very good accessibility to the city centre (where the majority of the tourism attractions are located) and the district centres, are considered to be an acceptable location for new hotel and short stay accommodation. Given Oxford’s long-standing housing issues, and the city’s inability to meet housing need within our administrative boundary, it is	None.

• Delete criterion d) from the policy • Include additional wording to confirm that proposals on out-of-centre sites on Oxford's main arterial roads will be considered favourably only where it has been demonstrated, through a sequential test, that suitable sites are not available within existing centres or edge-of-centre locations • The reasoned justification should confirm that dedicated car parking will be restricted to provision for operational and accessible purposes only.	important that sites for new hotel and short stay accommodation are supported in locations which minimise direct competition for land which could otherwise be delivered as homes. As the plan's focus is to deliver residential dwellings, it supports a locational strategy which enables the delivery of other uses in a variety of bespoke locations across the city. We do not support the proposed modifications. Other policies in the plan address non-residential car parking, and these would apply to all non-residential development in the city.	
The policy as drafted seeks to limit the location of hotel and short stay accommodation to: a) The City Centre; b) District Centres; c) Sites allocated for that purpose; d) Sites on Oxford's main arterial roads where there is frequent and direct public transport. In our view, and having regard to the particular circumstances of our client's site, it would be appropriate to amend criterion (b) to "District Centres or (appropriate) locations within up to 100 metres of the boundary of a District Centre". Amenity policies are capable of protecting neighbours. Policies should not be so rigid as to prevent good development from occurring. NPPF paragraph 86 identifies that policies should not be rigid and should be flexible to	We have produced an evidence base including a study which has worked out demand for bedspaces in the city. We recognise that delivering hotel and short-stay accommodation is one aspect of helping the visitor economy. Given Oxford's long-standing housing issues, and the city's inability to meet housing need within our administrative boundary, it is important that sites for new hotel and short stay accommodation are supported in locations which minimise direct competition for land which could otherwise be delivered as homes. As the plan's focus is to deliver residential dwellings, it supports a locational strategy which enables the delivery of other uses in a variety of bespoke locations across the city.	None.

account for change. The present policy is insufficiently flexible. There are no allocations for new hotels that we are aware of. The policy framework is not sufficiently addressing needs as expressed by visitors seeking individual experiences as opposed to larger corporate style hotels.	We consider that the policy enables sites for hotel and short stay accommodation to be delivered in accessible locations. The Plan includes a number of site allocations which refer to hotels, including Policy SPE16, SPS13, Policy SPCW2, while a range of site allocations also refer to "main town centre uses", including SPCW9, SPCW10. While Policy SPCW8 refers to complementary culture, arts and leisure uses. The site size threshold for category 2 employment sites in the city and district centres also means that there are improved opportunities to deliver hotel accommodation in the city and district centres.	
The draft Policy should make it evident that flexibility should apply with regard to the application of this policy against wider plan policies to enable development to be delivered to meet the ambitions of the Local Plan and in particular with reference to the Nuffield Sites. It is suggested that supporting text is incorporated which supports a flexible approach toward loss of short stay accommodation where site allocations are supported for comprehensive mixed use redevelopment, as well as an additional bullet point included in the policy itself regarding the list of circumstances where the loss of short stay accommodation is supported.	We consider that the wording of Policy E5 as proposed is sufficient. The policy allows the loss of larger (10+ bedrooms) hotels and short stay accommodation in the city centre (and other specified locations) provided any of the criteria are met. Criteria i) sets out that the loss "should be demonstrated through the submission of robust evidence that it is no longer viable in that use". We don't think that the wording proposed is suitable as it could potentially result in the loss	None.

This additional bullet point could be incorporated / read as follows: ▪ Or forms part of comprehensive, mixed use development scheme.	of hotel uses (for which there is an established need in the city) too easily.	
Tourism is a significant sector of Oxford's economy and brings its own pressures and problems. It is disappointing to see that whilst reference is made 'Accommodating significant numbers of day visitors to Oxford can be challenging…' there is no specific reference in the policy towards addressing these issues. We'd like to see the inclusion – either in this policy or other standalone policies – of measures to: • mitigate the impact of tourism on the city's historic core; • better enable the accommodation of large groups within the public realm; • manage tourist arrival and departure, including coach parking.	City's Economic Strategy 2022-2032 stresses the importance that the visitor economy plays int he city and provides a clear strategy for developing the visitor economy – in fact it is one of the three elements that the Delivery Plan of the Economic Strategy focuses on. The City Centre Action Plan also focuses on Visitor and Tourism Management setting out a set of progress and actions to help enable a healthy visitor economy. We consider that the policy sufficiently addresses issues that can be controlled or influenced through the plan.	None.

Chapter 4

General comments relating to Chapter 4

POLICY	Chapter 4	
All respondents **supporting** policy	43.8	98.5

COMMENT SUMMARY	OFFICER RESPONSE
No comment left.	
Whole chapter is sound	Support welcome.

POLICY	Chapter 4				
All respondents **raising objections** on this policy/chapter	90.5	138.17	139.7		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Natural England has made a representation relating to a potential omission policy, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
We consider it unsound that there is no policy relating to the Oxford Green Belt.	National policy on green belt protection does not need to be repeated at local level. Policy G1 sets out in its supporting text (second bullet	None.

The protection of the Green Belt, not least for its purpose in protecting the setting of Oxford, is consistent with national policy and this should be provided at a local level too. The Green Belt not only forms part of Oxford's wider green setting but also provides protection for a number of 'green fingers' which run into the heart of city itself. The omission of a specific policy to protect this highly sensitive land is highly concerning.	under the policy implementation section), that applications proposed within Green Belt would be determined in accordance with national policy. Policy G1 sets out levels of protection for a network of spaces within the green infrastructure network depending on the local benefits they provide and regardless of whether they are in green belt or not. Core and supporting spaces have been identified across the city as such.	
We ask that these areas of land, including Wolvercote Lakes, Larkins Lane Field, Marston Fields, be included within the areas identified as Green Infrastructure on the proposed policies map, due to the significant contribution they make to the city and its people, in terms of fully accessible green space.	Wolvercote Lakes is already identified as a Core Space under policy G1 on the policies map (site ID 178) and Marston Fields are also included in the network already (site IDs 655 and 656). We have reviewed the other suggested site against the criteria set out in the background paper which determines whether they would be designated as core or supporting spaces under Policy G1. Larkins Lane Field appears to meet the criteria of a supporting space and we propose a mod to policies map to add this.	Mod proposed to the policies map to add Larkins Lane Field as a supporting space within the Policy G1 GI network.
Pleased to see reference to fen habitats but consider that specific reference should also be made to ancient floodplain meadows and MG4 grassland within the policies in this chapter.	We acknowledge that there are a range of important habitats across the city. Policy G6 sets out a hierarchy of protection for designated ecological sites as well as natural and/or semi-natural habitats, or protected species found elsewhere. It sets the framework for protection, including the requirements that applicants will need to fulfil (e.g. applications that could impact them will need to be informed by targeted ecological surveys and	None.

	satisfactorily addressed in accordance with the mitigation hierarchy). We do not consider that it is necessary to explicitly list all potential habitats that could be encountered in the policy.	
Objections to the general approach of green infrastructure protection – including that: • No evidence/methodology as to how each green space type (e.g. Core or Supporting) is determined. • Green Infrastructure is marked incorrectly, both in area, description, and accessibility on Policies Map. If access were clearly marked, it would show much space is in fact wholly unusable. • Green space in allocated sites is often not marked or protected (John Radcliffe) • No overall assessment of green space need per "Urban Village", per habitant, or deprivation, therefore allocation is site by site with no strategic overview how much remains in each or how equality objectives will be met. • No allowance for population growth although four times the predicted rate in 2007 or assessment of local need or green deprivation (Equality) • No comprehensive strategy for sports provision when most sites are earmarked for development piecemeal. And playgrounds not marked as green space.	The Green Infrastructure Background Paper (BGP.005a) explains how the Council has classified core and supporting spaces. It also includes a table in the appendix explicitly setting out the reason a space has qualified as 'core'. The protection for green spaces is based on their identified functional benefits and is unaffected by the level of accessibility (which could change), as such it is unnecessary to identify this on the policies map. Maps of accessibility are however included in the GI study 2022. A key challenge in the city is the unequal provision of green space, some areas have access to a lot of green space (e.g. areas in proximity to the SAC), whereas other areas have limited access. The constrained nature of the city also means it is challenging to create large new areas of green space to address existing deficiencies, or population growth. As such, an assessment of green space per person, or per hectare has limited value, as would the setting of policy targets tied to this. This is why the Local Plan focuses on protecting a strong network, and enhancing the spaces within it where possible so it improves in quality and	No further change proposed.

• The 2022 Green Infrastructure Study is fundamentally flawed in methodology and input data.	multi-functionality (though G2 does seek to secure new open space on larger development sites). On sports provision, pitches are protected as part of the GI network, as well as national policy. The Council is in the process of undertaking a new Playing Pitch Strategy which will help to support the delivery of the Local Plan (e.g. it will be a key resource for applicants to consider where they propose applications that impact pitches, and it will also inform the needs for new facilities). *Comments on the Green Infrastructure study are picked up and addressed in detail in the evidence base section of the consultation report.*	
The G1-G9 policies are unsound as no protection is conferred on playgrounds which are generally unmarked and unprotected unless part of a larger green space.	The policies in this chapter deal with a range of topics, from green infrastructure (G1-G3), to biodiversity (G4-G6), flooding (G7 and G8) and climate resilience (G9). National policy already sets out that existing open space, sports and recreational buildings and land, including playing fields and formal play spaces should not be built upon unless the proposal meets particular criteria. Policy G1 provides additional protection to a range of spaces within the GI network that are of particular importance to the city and some of these include play facilities. The policy sets out that applications impacting certain types of open space within that network will need to include additional evidence considering (criterion bi.) *the role of*	No further change proposed.

	the space in supporting people to socialize, take part in informal recreation (particularly where facilities like children/youth play and outdoor gym equipment are present), or as an escape from the urban environment. We are content that there is sufficient and appropriate protection provided for playgrounds.	
Inclusion of Large Developments on Oxford's Boundary Required must be clearly marked to assist in determining the suitability of land allocations and determining the value of green space.	The Local Plan's policies map reflects the spatial extent of the policies and allocations in the plan and these do not extend beyond the city's administrative boundaries. It would not be appropriate to identify proposals outside of the boundary on the policies map.	No further change proposed.

Policy G1

POLICY	G1		
All respondents **supporting** policy	7.1	36.1	90.1

COMMENT SUMMARY	OFFICER RESPONSE
Natural England has made a representation supporting Policy G1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	G1				
All respondents **raising objections** on this policy/chapter	49.2	57.4	59.8	65.1	69.1
	85.3	89.8	138.9	139.21	159.9
	160.4				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxford canal should fall into the Core spaces category - due to its fundamental role in supporting the city-wide network, providing wildlife habitat and corridor functions, flood storage, intensity of use and strength of heritage or other local value. These benefits are typically intrinsic to the canal and cannot be easily re-provided elsewhere without compromising their character and/or function.	The canal and the adjoining land are designated as a city wildlife site and lie predominantly within Flood Zone 3b. There are other regulatory regimes outside of planning that would further restrict development that would impact the canal.	None.

It is not possible to take these aspirations seriously when the development policies of Oxford City Council of prioritising development land for employment, inflating housing demand and 'unmet need' and exporting inflated 'unmet housing need' to neighbouring districts has resulted in the destruction of so much Green Belt countryside, biodiversity and habitats, which can never be rectified or enjoyed by future generations.	A balance needs to be struck between the many competing priorities for land and meeting the needs of the city. All suitable and available sites with development potential need to be considered as part of our efforts to address the city's housing need. The plan also recognises the importance of open space, and other forms of green infrastructure and protects a strong network of green space across the city (as with the adopted local plan).	None.
Sport England has made a representation relating to Policy G1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy G1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Local Plan should ensure that there will be no net loss of playground space across Oxford unless this would have a significant or adverse impact upon public amenity or ecological interest, in the context of increasing pressures for development.	Specific wording to this effect in this policy is not considered necessary, as this is already carried out through Policy G1, C3 and NPPF provisions.	None.
The allocation for Core and Supporting arbitrarily draws a line between one and the other, without any reasonable balance being provided to a sliding scale of quality both internally within individual Green Infrastructure, or when comparing the lowest quality Core against the highest quality Supporting.	The NPPF includes a requirement for plans to distinguish a hierarchy of nationally and locally designated sites, to allocate land with the least environmental and amenity value, and to take a strategic approach to maintaining a network of green infrastructure (para 188). The proposed hierarchy in the policy is consistent with the approach required by national policy	None.

	and has a framework for how it applies to the Oxford context.	
There were comments objecting to the Core policy wording. For example, that it has no flexibility for the scale of green or blue infrastructure, scale of existing and proposed development, exceptional circumstances, or the possible wider reprovision or enhancement of the infrastructure. Another comment flagged that the assumption that Core 'spaces cannot be moved/re-provided sufficiently without compromising the overall character and function' is subject to each site's individual merits and proposals. For example, Core areas may have lower quality sub-areas within them. This conclusion should not be drawn at this stage and result in a blanket in-principle ban on development within designated areas. The proposed wording conflicts with the aim of the policy, which seeks to protect Green Infrastructure from 'inappropriate development', requiring mitigation where development comes forward.	As set out in the Background Paper (005a), core spaces are designated because they are considered to provide a range of important benefits including some which are tied to their existing location, the loss of which is considered unfeasible to be able to be mitigated through reprovision elsewhere. It is considered important that they are appropriately protected to a degree that reflects their identified value as part of the wider green infrastructure network. However, having further reviewed the approach, we propose a modification to the wording in relation to the approach to protecting core spaces. This would provide some flexibility to allow compatible uses to come forward, whilst still seeking to set a strong level of protection that corresponds with the identified value of these spaces and also retaining particular identified benefits in situ.	Modification proposed to amend wording of policy as follows: *G1A: Core spaces* *Planning permission will not be granted for development that would result in loss of, or harm to, the protected spaces identified as part of the Core GI Network unless this would be for complimentary uses that would not negatively impact upon the particular in situ benefit(s) for which these spaces are designated, and if this is accompanied by enhancement of other parts of the core space. These spaces are designated G1A on the policies map.*
Land at Old Marston: We strongly object to the downgrading of the Marston Gap sites from Core to Supporting within the Green Infrastructure Network and consider this unsound. Barton Triangle and Larkins Lane Field: We strongly object to the exclusion of Larkins Lane Field and the Barton Triangle from the Green Infrastructure Network and consider this	Core spaces are designated as such because of fundamental characteristics that make their reprovision impossible or impractical. Supporting spaces may not have the same identified benefits but still play important roles for public amenity and wellbeing, as well as environmental functions. Both Core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum	Modification to policies map to designate Larkins Lane field and Barton Triangle as supporting spaces under Policy G1's Green Infrastructure Network. No further action in redesignating Marston Gap.

unsound. Larkins Lane has a high ecology value and is the subject of an ongoing valley fen restoration project. Barton Triangle is an open green space. Both are visually important elements in the setting of Old Headington Conservation Area.	mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces'). We have set out in the Background Paper (BGP005a) the criteria used for identifying core space – in some cases the underlying information has been updated since the Reg 18 stage – e.g. new flood risk mapping, which has resulted in some changes to the core spaces with some changing to supporting tier, and some supporting changing to core. We have reviewed the suggested additional sites of Larkins Lane and Barton Triangle against the criteria set out in the background paper which determines whether they would be designated as core or supporting. These spaces appear to meet the criteria of supporting spaces and we propose a mod to add these to the policies map.	
The policy is unsound and ineffective, as it is mathematically impossible for a development which reduces green space, to "reprovision" elsewhere, which is also green space, further the term is not explained in the glossary. The conflict between Residential gardens in designated green space protections in Policy G1 must be resolved in favour of Green Space protection, or Core Green space could be lost where land is in both as in the Lye Valley example above.	'Reprovision' in the policy could entail either quantitative reprovision (e.g. like for like space being created) or qualitative improvements. Where space is constrained, qualitative improvements would mean that green infrastructure benefits of another area of green space could be enhanced through additional planting and other qualitative improvements which would mitigate the loss. Green space protections are not superseded by the requirements for development on residential garden land.	None.

Policy G1 sets up a hierarchy of spaces, but the criteria for classifying sites are neither objectively measured nor measurable: *Intensity of use: There is no indication how intensity of use will be quantified, or criteria for determining whether a site is surplus to requirements. *Local value: It is not clear how adequate and proportionate evidence could be collected to determine whether a site is delivering insufficient local value. *Loss will be resisted: If a local group campaigns to resist loss of a GIC site, will it be re-categorised as GIB? *Multifunctionality: If a site is both small and assessed as multifunctional, will it be placed in GIC because it is small or GIB because it is multifunctional? *Small: How will it be determined whether a site is too small?	The methodology for arriving at the criteria for categorising individual spaces in the Green Infrastructure hierarchy are set out in Background Paper 005. For supporting spaces, functions of a site and the requirements for any mitigation where a loss/harm is likely, will need to be informed by a range of information sources as outlined in the policy. The considerations will vary somewhat depending on each site however. As the policy sets out, the Council will expect applicants to review a range of relevant information such as the green infrastructure study, playing pitch strategy, local contextual info etc.	None.
* Reprovision for category GIB and GIC is to be "sufficient." This would conflict with the requirement for provision to be equivalent or better in quality AND quantity.	The policy wording specifically requires for reprovision to be at the same standard or higher, and ideally onsite.	None.
There is a requirement for applicants applying for permission to build on GIB facilities for Parks, accessible greenspace and amenity greenspaces to provide additional evidence that demonstrates consideration of needs and deficits. Policy G1 e.g. notes a deficit of playgrounds in the city centre," but it is not clear how this was determined. The criteria for	The GI study also provides an overview of areas in the city where there are particular green space deficits and will be useful in determining how these can be addressed through development.	None.

determining whether recreation spaces are surplus and can be downgraded are equally unclear.		
There is little objective assessment of needs for "other uses". "Larger developments are expected to include a proportion of the site as public open space with a mix of uses tailored to the needs of occupants and the local area," but no indication as to how those needs should be determined. There are no access standards for parks and green spaces. There is lots of research into the benefits of G1, but no mechanism for determining a quantum above which GI would be considered surplus.	There are departments within the City Council with the specific remit for the management of green spaces and much of the public realm in Oxford. Any evidence that is submitted in relation to the impacts of development will assessed on their own merits in conjunction with planning officers. This will include assessment of the suitability of approaches to meet local needs as set out in development proposals. The determination on whether or not a green space or other amenity facility is surplus to requirements is not made by planning officers but in conjunction with relevant officers within the Council that have the appropriate remit.	None.
* G1 specifies that reprovision can be delivered "quantitatively (like-for-like replacement) or qualitatively (enhancements that improve the functionality and quality of other areas - demonstrated via the Urban Greening Factor or similar methodology)." It is not clear which "similar methodology" could be used to assess the functionality and quality of recreational space.	The Urban Greening Factor methodology as set out in Policy G3 is endorsed by the Natural England GI Framework and is relatively well known and recognised by practitioners. The highlighted wording (i.e. similar methodology) was included in order not to be unduly exclude other methods that may achieve the same objective, so long as it is evidenced.	None.
It is clear that house building will be at the expense of many "well-designed, beautiful and safe places, with accessible services and open spaces." This will make it more difficult to meet	All suitable and available sites with development potential are considered as part of our efforts to address the city's housing need. The plan also recognises the importance	None.

“current and future needs and support communities’ health, social and cultural well-being.”	of public open space, and other forms of green infrastructure.	

Policy G2

POLICY	G2
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	G2				
All respondents **raising objections** on this policy/chapter	12.1	57.5	65.2	85.4	89.1
	90.2	104.14	136.6		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
…although point e) mentions climate change, it does not explicitly include the scope for blue infrastructure to supply renewable energy or improve energy efficiency. Water source heat pumps can potentially supply a large fraction of the city's heat very efficiently, but that potential is restricted to the blue infrastructure, where green belt policy is currently a constraint on the development of a sustainable heat source.	The local plan does not state specific preferences or restrictions on technologies in relation to renewable energy or climate change mitigation.	None.
Policy G2 does not address the needs of children and young adults. The treatment of recreation space as another sort of green infrastructure means that spaces will be more likely to be multifunctional, but recreation may	The local plan's remit is to provide a policy framework that development schemes may be assessed against when coming forward for planning permission. Policy G1 protects a network of green spaces, and sets out different	None.

be a primary function of much GI space in Oxford. In the absence of a local recreation policy, simply requiring spaces to take into account the "Health and wellbeing, including facilitating recreation and play for people of all age groups and abilities and abilities, particularly children and teenagers" is meaningless. If there is no policy, there is no way for an applicant to know what the objectively assessed needs are, and so no way to ensure that those needs are met.	levels of protection depending on if they are core or supporting spaces. It outlines that where loss/harm could occur, there could be a variety of considerations that will need to inform any mitigation, including the current role of the space. Criterion b.i. specifically identifies that some spaces have a role for socialising/recreation and flags that facilities like children/youth play could be present. This is highlighted to ensure applicants consider their impacts on such facilities particularly. Policy G2, meanwhile, sets out the considerations that should inform design of new green infrastructure. We have sought to ensure reference is made to a variety of benefits that could be incorporated into the design process (which will also need to be informed by local context). Criterion b discusses facilitating recreation and play for people of all age groups and abilities, particularly children and teenagers. Box 4.1 in the supporting text talks further about how applicants should approach design of green infrastructure, including tailoring types of open space to meet identified needs or deficiencies and flags incorporating play features for younger people as an example. A range of evidence supports the Local Plan and can help inform an assessment of need, however, this context changes over time and applicants will need to consider the most up-to-date information, which could also include policies/strategies that exist outside of the Local	

	Plan/planning system. The policies of the plan provide the relevant requirements and additional guidance which should ensure the most appropriate considerations inform the application at the time.	
Oxfordshire County Council has made a representation relating to Policy G2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Natural England has made a representation relating to Policy G2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England has made a representation relating to Policy G2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy G2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy G3

POLICY	G3	
All respondents **supporting** policy	107.5	120.8

COMMENT SUMMARY	OFFICER RESPONSE
Broadly supportive of the aim of this policy as it recognises the clear advantages offered by the provision of high-quality green space in new developments	
Principle of urban greening is supported.	

POLICY	G3				
All respondents **raising objections** on this policy/chapter	107.5	120.8	89.11	157.9	136.7
	130.6	159.1	138.2		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
At Oxford Stadium, the car park has very limited green infrastructure, confined mainly to boundary planting. Future enabling development would likely need to be delivered at high density to generate sufficient financial returns to secure the stadium's future. Applying this policy could risk sterilising the site and similar brownfield sites, potentially	It should be noted that Oxford Stadium is no longer a site allocation. The UGF is a tool intended to ensure new developments incorporate a good level of greening, which has a variety of positive impacts. The measures proposed to achieve this requirement may overlap with requirements for protection and BNG, but for example even	None

undermining wider benefits such as safeguarding the stadium and delivering housing in a highly sustainable location. Additionally, the necessity of this policy is unclear given that national Biodiversity Net Gain (BNG) requirements already exist and are reflected elsewhere in the Plan. Compared to BNG, the proposed approach offers only a simplified output, raising questions about its added value and the justification for introducing an additional layer of calculation.	where BNG is off site there should still be green infrastructure on the site, and this may be part of protecting and enhancing existing but in some cases there will be no or little existing and there are benefits to it being introduced. The measures needed by the policy have been broadly tested on the site allocations and are achievable. A whole range of creative options are available that have limited impacts on the development space, and developments without green features will not create good or attractive places that people want to work or live in. A tweak has been made to the policy regarding the baseline score on green sites, to make it more achievable.	
While urban greening is supported, applying draft Policy G3 universally could create an unnecessary technical burden, particularly for greenfield sites. Natural England guidance indicates the Urban Greening Factor (UGF) should mainly be used in urban or suburban areas, or targeted locations where greening is a key issue, such as brownfield or Green Belt sites. It is therefore suggested that Policy G3 be refined to focus on these specific contexts rather than all development. For Ruskin Field, although the Draft Plan states the site is likely to exceed UGF targets, it is unclear how this conclusion was reached	The thresholds for UGF in the plan are markedly lower than the recommended minimum contained in Natural England's GI Framework which informed this policy, in recognition of the constrained nature of development sites in Oxford. Thresholds for non-residential schemes are lower still than that for residential led proposals. The intention behind the policy is to localise as much as possible the benefits that arise from the presence of natural features in development, which will difficult to achieve if offsetting is allowed. The measures needed by the policy have been broadly tested on the site allocations and are achievable. A whole range of creative options are available that have limited impacts on the	None

without detailed landscape proposals, and whether this assumption relates to the site's proposed minimum capacity of 28 dwellings.	development space, and developments without green features will not create good or attractive places that people want to work or live in. A tweak has been made to the policy regarding the baseline score on green sites, to make it more achievable.	
Oxfordshire County Council has made a representation relating to Policy G3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Policy G3 introduces the Urban Greening Factor (UGF), requiring developments to achieve a minimum score or at least no reduction from the baseline, based on on-site green infrastructure. While acknowledging constraints on delivering new green space, this requirement may place significant pressure on sites with limited area and competing functional needs. In some cases, such as schemes on former greenfield land (e.g. Oxford North), achieving "no net loss" may be unrealistic, potentially sterilising development and preventing wider benefits such as housing delivery. It is therefore suggested that this requirement be removed.	The required score has been set to encourage as much as possible the achievability of application for constrained sites with limited developable areas. It is lower than the recommended minimum in the Natural England Green Infrastructure Framework. The UGF methodology is not intended as a replacement for detailed ecological analysis and associated metrics such as DEFRA Biodiversity metric, even though they have complementary aims. Metrics such as BNG are linked to a wider ecological context, which can allow for offsetting and off site contributions in the appropriate circumstances, whereas the intention for UGF is to localise the benefits that come from the onsite establishment of natural features including climate adaptation, mental and physical health and wellbeing and biodiversity.	None

The policy also duplicates biodiversity net gain (BNG) requirements, offering only a simpler metric, and it is unclear why this additional layer is necessary—particularly as UGF has typically been introduced elsewhere before BNG became mandatory. Furthermore, it overlaps with Policies G1 and G4 but lacks the flexibility of G4, which allows for off-site mitigation, raising concerns about its effectiveness.	As set out in the Regulation 18 Consultation Report, the scores contained in the policy are intended to be a minimum. The required score has been set at the level it has, to encourage as much as possible the achievability of application for constrained sites with limited developable areas. It has been set lower than the recommended minimum in the Natural England Green Infrastructure Framework based upon informal testing on a range of sites across the city to see what was achievable across the Oxford City context, we are comfortable with this approach. Site allocation isn't a conflict, it's flagging that its below the score currently and needs to introduce additional greening to meet the minimum score.	None
Policy G3 seeks to introduce minimum urban greening factor (UGF) scoring that needs to be demonstrated for major development proposals. The NPPF states that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 188) and local planning authorities should take opportunities to improve biodiversity when assessing individual applications (paragraph 193). UGF is used in The London Plan and in other major cities across Europe, but there is no evidence that its use is justified in Oxford. It is considered	The UGF is a tool intended to ensure new developments incorporate a good level of greening, which has a variety of positive impacts. The measures proposed to achieve this requirement may overlap with requirements for protection and BNG, but for example even where BNG is off site there should still be green infrastructure on the site, and this may be part of protecting and enhancing existing but in some cases there will be no or little existing and there are benefits to it being introduced. The meaures needed by the policy have been broadly tested on the site allocations and are	None

that the incorporation of policy G3 will result in an unnecessary additional policy hurdle and achieving net gains in biodiversity and enhancing networks of habitats and green infrastructure as required under the NPPF, Policy G4 and Environment Act 2021 can be sufficiently achieved under existing policy requirements, which in turn will result in urban greening. It is requested that this policy be deleted as it is not justified as it will duplicate policy requirements which deliver the same outcomes.	achievable. A whole range of creative options are available that have limited impacts on the development space, and developments without green features will not create good or attractive places that people want to work or live in. A tweak has been made to the policy regarding the baseline score on green sites, to make it more achievable	
The requirement to provide new green space is acknowledged as challenging, particularly for sites with limited space and competing functional demands. However, the policy risks placing excessive pressure on applicants and could effectively sterilise development opportunities that might otherwise deliver wider benefits, such as increasing housing supply. The Urban Greening Factor (UGF) duplicates biodiversity net gain (BNG) requirements by offering a simpler metric, raising questions about the need for this additional layer, especially as UGF has typically been introduced in areas like London prior to mandatory BNG. Overall, the policy is considered ineffective, as it largely repeats Policies G1 and G4 but lacks	The required score has been set to encourage as much as possible the achievability of application for constrained sites with limited developable areas. It is markedly lower than the recommended minimum in the Natural England Green Infrastructure Framework. The UGF methodology is not intended as a replacement for detailed ecological analysis and associated metrics such as DEFRA Biodiversity metric, even though they have complementary aims. Metrics such as BNG are linked to a wider ecological context, which can allow for offsetting and off site contributions in the appropriate circumstances, whereas the intention for UGF is to localise the benefits that come from the onsite establishment of natural features including climate adaptation, mental	None

the flexibility of G4, particularly in allowing off-site mitigation. It is therefore suggested that Policy G3 be deleted.	and physical health and wellbeing and biodiversity.	
The policy is ineffective as “technically infeasible” is not defined or enforceable.	It has been set lower than the recommended minimum in the Natural England Green Infrastructure Framework based upon informal testing on a range of sites across the city to see what was achievable across the Oxford City context, we are comfortable that the scores are technically feasible. The second bullet point of the policy implementation in supporting text explains what the applicant needs to evidence to demonstrate whether it is feasible or not.	None

Policy G4

POLICY	G4
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	G4				
All respondents **raising objections** on this policy/chapter	59.9	90.3	112.6	89.12	138.21

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The Local Plan policy should have been prepared with a needs assessment that takes into account a range of factors including: that losses in biodiversity in the city have been greater than elsewhere due to urbanisation; that past declines need to be addressed; that biodiversity will continue to be under pressure from development; that BNG would not impact viability/housing supply; that natural capital is important for a range of economic and social benefits as well as environmental; that residents have called for greater access to nature; and that enhanced biodiversity was central to the net zero vision of the 2019 climate emergency declaration.	The Local Plan has been prepared with careful consideration for how we can ensure that new development not only mitigates impacts on biodiversity but also delivers enhancements to improve biodiversity in the city for the range of benefits it provides. The Council is aware of the significant stresses being placed upon biodiversity in the city and the ongoing threats to the range of nationally and locally important species in the city and the bespoke background paper on biodiversity (BGP.005b) details the range of considerations that have gone into drafting the policies.	None.

Policy should be amended so it seeks Biodiversity Net Gain which exceeds 10%-- asking for a minimum of 20% BNG.	Exceeding the statutory 10% target needs to be robustly justified. Additionally, the BNG mechanism is only one way that biodiversity can be supported in the city (the metric ignores the benefit of some types of enhancement that can be particularly helpful for priority species in the city). The Council has instead opted to bring forward other policies tailored to our particular local context alongside the national 10% BNG requirement, for example, requirements to support local species through onsite ecological enhancements in policy G5 and policies encouraging more general greening such as policy G3 that can support biodiversity but also other wider health and wellbeing of residents and the environment.	None.
Natural England has made a representation relating to Policy G4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Delivery of 10% BNG is already a statutory requirement applied post permission and the Local Plan does not need to repeat this. Opening para should be amended or deleted.	It is considered important to embed the requirement in the Local Plan because it enables us to set out some locally-specific considerations about how it is implemented. Whilst it might not be strictly necessary to repeat the percentage, in this case it is considered simpler for applicants than cross-referencing to the national requirement and not mentioning the % specifically, as it would not set the context for the locally-specific criteria.	None.

In relation to the offsite BNG delivery hierarchy. The PPG does not indicate that Councils can specify where offsite gains should be delivered. The metric already includes a spatial risk multiplier which increases the number of units required to deliver net gains the further it is delivered from the site, so there is no need to specify where it should be provided. The main focus should be identifying locations where units can be purchased within or close to Oxford. As such, this paragraph should be deleted.	Whilst it is acknowledged that the metric's spatial risk multiplier incentivises local delivery to some degree, it is important for the Local Plan to clearly communicate the preference for offsite BNG to be delivered as close to the development site as possible. Applicants are directed towards looking for opportunities as close to the development as possible before looking for options further afield, this additional local guidance is considered helpful in guiding proposals to secure the greatest local benefits for habitats and species as well as residents.	None.
Oxfordshire County Council has made a representation relating to Policy G4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The policy is ineffective as it does not address destruction of unique habitat off-site such as the Lye Valley.	The policy is not intended to do this. The policy sets out expectations for delivery of Biodiversity Net Gain as part of new development coming forward in the city.	None
The policy must include provision for where the habitat is NOT swappable, it should not be permitted to be justified.	The requirements for responding to different types of habitat, including where these can and cannot be substituted for other habitat types, as part of calculating Biodiversity Net Gain are set out in the DEFRA guidance which accompanies the Statutory Biodiversity Net Gain Metric, which the policy refers to. Applicants will also need to accord with policy G6, which protects a hierarchy of existing habitats and species in the city and sets out clearly what is expected of an application –	None

	where habitat loss could result, that policy sets out how this should be addressed.	

Policy G5

POLICY	G5
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	G5				
All respondents **raising objections** on this policy/chapter	5.1	40.5	46.1	78.5	112.7
	89.13	138.22			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Whilst the principle of the policy is very welcome, the mandatory requirements as listed in Appendix 4.2 need to be amended to align with the requirements for integrated nest boxes as set out in NPPG Natural Environment 2025 paragraph 017. Without this, the requirement for bird boxes as set out currently in supporting Appendix are open to interpretation and could result in less preferable 'external' boxes which do not align	Whilst we do not consider this to be strictly a soundness issue, we are happy to modify as per the suggestions where this would help to clarify things.	Modifications to Appendix 4.2 are proposed as follows: **Under the section in the table *Pot 1: Mandatory requirement - Household/Minor/Major,* amend the text as follows:** *At least one integrated swift brick (preferred)~~box~~ or swift box~~brick~~*

with national guidance. Suggested modifications: • (Pot 1 Mandatory requirement - Householder/ Minor/ Major) - place the word 'bricks' first before the word 'boxes' and state 'preferred' after the word 'bricks' i.e. "at least one swift brick (preferred) or swift box". • (Pot 1 Mandatory requirement - Minor/ Major) - after "building-dependent species" add "such as swift bricks (preferred) or swift boxes".		**Under the section in the table *Pot 1: Mandatory requirement - Minor/Major,* amend the text as follows:** *At least one bird box per dwelling (resi) or per 1000m2 footprint (non-residential), including consideration of building-dependent species (such as integrated swift bricks (preferred) or swift boxes).*
The policy is not justified because it introduces a prescriptive points-based approach without clear evidence that such an approach is necessary to secure biodiversity outcomes beyond those already required through Biodiversity Net Gain legislation in the Environment Act 2021. An appropriate balance between encouraging meaningful ecological improvements and maintaining design flexibility for applicants should be achieved which takes into account varying context/constraints of sites. Policy could introduce unnecessary complexity and administrative burden, particularly for smaller or lower-impact schemes. Alternative wording should be proposed which avoids overregulation while still setting a clear policy expectation for on-site ecological enhancements – i.e. thoughtful, integrated	As is set out in the Biodiversity background paper (BGP.005b), the Statutory BNG metric primarily focuses on delivery of habitat as a way to support species. However, there are other important features that support important wildlife in the city which are not recognised/incentivised by it and relying on the statutory BNG requirement to deliver for them alone would be insufficient. The policy is prescriptive to some degree, in that a certain number of enhancements will be required depending on the scale of a proposal, and there are some limited mandatory features, however, applicants are then left with flexibility to select the most appropriate enhancements for their site in order to meet the required totals otherwise. The proposed list of ecological enhancements presented in the Appendix helps to provide clarity to applicants over the types of features (and how many) they	None.

biodiversity features rather than a checklist approach should be encouraged.	need to implement to meet the asks of the policy and support local species, but it is up to applicants which are selected based upon the context of their particular site and application.	
Requirement to deliver ecological enhancements associated with 'all' new development is onerous and unnecessary. Moreover, it exceeds the statutory requirements. On its face, it would require changes of use and minor works such as shopfront replacements to deliver onsite ecological enhancements, that would be neither reasonable nor practical to provide. Policy should be amended to exclude minor commercial developments.	The requirements do exceed statutory requirements, this is because there are additional provisions that are important to seek to deliver to support local species which cannot be satisfactorily provided for through statutory requirements like BNG. In most instances we would expect that the minimum requirements should be achievable, particularly with the flexibility afforded to which measures are selected beyond any mandatory requirement. We have reviewed the list in the appendix, however, and propose a mod to one part of the mandatory requirements to ensure that the requirement is expected only of sites with outdoor space.	**Mod proposed to Appendix 4.2 as follows:** *Where the site includes areas of outdoor space, c~~C~~hoose two of the following: insect hotel, planting for pollinators, night-flowering species*
Improvements in biodiversity are delivered though statutory Biodiversity Net Gains and as such it is unjustified to require additional ecological enhancements to buildings. It is recommended that the first sentence and third paragraphs of G5 are deleted.	As per the response above, the Statutory BNG metric primarily focuses on delivery of habitat as a way to support species. However, there are other important features that support important wildlife in the city which are not recognised/incentivised by it and relying on the statutory BNG requirement to deliver for them alone would be insufficient.	None.
Oxfordshire County Council has made a representation relating to Policy G6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

It is ineffective as the wording is fluffy "strongly encouraged" means nothing and the outcome is not measurable.	Whilst 'encouraging' applicants to pursue certain elements of the policy may not have the same weight as requiring them, it is still considered important as a clear steer as towards how the Council would wish to see proposals addressing the topic of onsite ecological enhancements. Some aspects of the policy will be dependent upon the type of proposal, site context and other considerations and may not always be of relevance.	None.

Policy G6

POLICY	G6
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	G6				
All respondents **raising objections** on this policy/chapter	2.2	90.4	93.1	89.14	85.6
	138.23				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Iffley Fields should be removed from the Local Plan.	See responses under the site allocations section of the Consultation report.	See responses under the site allocations section of the Consultation report.
Natural England has made a representation relating to Policy G6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
It would be beneficial to include reference to the Great Crested Newt District Licence scheme to raise awareness and support sustainable development in your area where there is a risk to great crested newts. Some potential wording that could be incorporated into policy G6 is put forward.	Thank you for the suggestion. We've reviewed the proposed wording included as part of the comments submitted, as we did when submitted at Reg 18 stage. We remain of the view that the level of detail goes beyond the scope of the policy, however this would potentially be helpful to reference in some way through the supporting Technical Advice Note (TAN) we intend to prepare to support the policy. We	None. We will consider further if it is appropriate to include in the Technical Advice Note in due course and how best to do this.

	would be open to further discussion as to how best to incorporate this into the TAN in due course.	
Oxfordshire County Council has made a representation relating to Policy G6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England have made representations against policy G6, these are addressed through the Statement of Common	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Ineffective, with excessive concentration on the Oxford Meadows SAC whilst the Lye Valley SSSI, comprising of a very rare alkaline fen, is scarcely mentioned. Lye Valley and other calcareous locations, such as Headington Hill Park, Ruskin College, Dunstan Park and other adjacent areas are at risk from increasing development leading to reduced groundwater, and increased scouring from surface water via urban drainage. G6 is ineffective as the mapping on the Policy Map is derived from the defective Hydrogeological Impact Assessment Report and incorrect. Further detail is outlined in full rep. Various suggested changes put forward, including: replacing the word “demonstrate” (that they have considered information from various sources) with “addressed”.	The policy is an overarching one that protects the full hierarchy of nationally designated and locally designated ecological sites in the city, as well as protecting other types of habitat and species. Whilst specific sites are referenced, these are mainly as examples to aid the reader, however, in the case of the Oxford Meadows SAC, the additional formal assessment requirements where development could have impacts warrant further guidance than would be included for SSSIs. Comments on the Lye Valley Hydrogeological Assessment report’s impact risk zones, which are included on the policy’s map to help ensure applicant’s appropriately consider the SSSI’s sensitivities to development in the wider area, are responded to in the evidence base section of the consultation summary. Refer there for a more detailed response.	None.

	The word 'demonstrate' is an instruction requiring applicants to evidence in their application how they have considered relevant information from a range of sources in determining the potential for adverse effects. We are unclear on how the suggested amend would improve the effectiveness of this part of the policy.	
In relation to Lye Valley and other calcareous locations, such as Headington Hill Park, Ruskin College, Dunstan Park and other adjacent areas areas, the following modifications are required to make the policies effective: • Removal of permitted development rights via Article 4 Directions in the Lye Valley catchment area and all of OCC and requiring greenfield runoff rates via infiltration; • Formal identification calcareous emergence areas such as Headington Hill and Dunstan Park, Ruskin College and others; • Permitting no further development in groundwater catchment, noting that SUDS are unacceptable as they will fail/require maintenance (see Lamberth report); • Updating all site policies that impact the Lye Valley; • Removing "*Any planning applications near the Boundary Brook or Lye Valley/SSSI/LNR/LWS etc) will also need to assess the potential for additional indirect impacts on the flora and fauna of those area..*"	<u>Article 4</u> The process for implementing an article 4 direction is complex, and must be justified and proportionate. It is also a separate process to the preparation of the Local Plan. Nevertheless, with the Local Plan the Council has sought to include a range of policies for reducing surface water run-off and reducing its water quality impacts (e.g. Policy G8 and R5) as well as generally increasing green surface cover on sites to mitigate impacts of urbanisation (Draft policy G3). <u>Identification of calcareous areas</u> As set out above, Policy G6 sets out a framework of protections for designated ecological sites as well as habitats and species outside of these areas, wherever they occur. Mapping of habitats is available from various national sources and applicants will need to reference the most appropriate sources alongside other information when informing their application. We do not consider it necessary or justified to identify particular types of habitat on the policies map.	Mod proposed to improve clarity of bullet point 1 under the 'policy implementation' section of Policy G6's supporting text as follows: *It is vital that existing biodiversity and features of ecological interest which could be impacted by a development are well understood and that impacts are avoided and/or mitigated. This includes features being directly <u>or indirectly</u> impacted on a site as well as those which could be adversely affected by adjacent development <u>either directly or indirectly</u>.*

3002

from Churchill (SPE6) policy and apply as a general statement to all development sites.	<u>Permitting no further development in groundwater catchment/SuDS not being appropriate</u> Policy G6, alongside national policy, set the framework of protection for the SSSIs, a blanket restriction on all future development in the catchment is not considered to be proportionate or justified. Whilst certain types of SuDS can be inappropriate in some areas, and policy G8 acknowledges this, this is highly dependent on site context and ground conditions which can vary. It is agreed that effective maintenance/management arrangements can be vital to the ongoing functioning of some types of SuDS, but again, this varies with the type and design of SuDS being implemented. We disagree that all SuDS are unacceptable in the catchment. <u>Site allocation wording needing to be updated</u> The wording referencing potential for impacts on the Lye Valley is included in some site allocations where these have been identified as being within the impact risk zones for the SSSI. They are intended as a helpful, additional marker for applicants to ensure that they consider these risks appropriately. The wording cross-refers to Policy G6 and will need to be read alongside this policy. We are comfortable with the wording as it is presented in the allocations.	

3003

	<u>Suggested additional general statement relating to indirect impacts on the flora and fauna</u> Policy G6 seeks to ensure development appropriately mitigates potential impacts on designated sites as well as habitats and species located elsewhere. These impacts could be direct or indirect, and will depend upon the context of the site and the development that is proposed. The additional wording suggested is not considered necessary, although we are happy to propose a mod to amend the supporting text of the policy to highlight this a little clearer.	

3004

Policy G7

POLICY	G7		
All respondents **supporting** policy	104.2	140.1	

COMMENT SUMMARY	OFFICER RESPONSE
The Environment Agency has made a representation and would like to highlight that they are pleased with the updated Policy G7.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Thames Water generally supports Policy G7 as it is in general accordance with the NPPF and the PPG and particularly supports the reference to sewer flooding.	Support welcomed.

POLICY	G7			
All respondents **raising objections** on this policy/chapter	40.6	87.4	138.24	140.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Do not support part q) of the policy as where necessary, redevelopment should be allowed to encroach into Flood Zone 3b as it could still result in a decrease in flood risk through careful design, even if the overall building footprint is the same or smaller than the existing built footprint.	The Environment Agency has made it clear that this approach is unacceptable. Careful design can avoid redevelopment of a site encroaching on Flood Zone 3b. If the first floor and higher levels of the building are developed, this does not affect the built	None

Agree that there should be no increase to the building footprint in the functional flood plain at ground floor level, but the footprint should be allowed to be increased at first floor and above at sites such as Osney Mead to ensure schemes such as this are viable. A balanced and pragmatic approach is required from the Environment Agency and the Council on this point and the policy must reflect this position.	footprint of the site, and the intensification of the site may be acceptable providing that all relevant criteria in the policy are met.	
A Sequential Test has been undertaken to support the Sustainability Appraisal, and Osney Mead has been assessed through policy SPCW8. Whilst draft policy G7 is clear, it would be helpful to see sight of Background Paper 9a which deals with brownfield development within FZ3b (which is referenced within the Sequential Test) as it is not on the Council's website.	The Flood Risk Sequential Test of Sites is a piece of evidence and was published for the Regulation 19 consultation under the 'Evidence Base and Supporting Documents'.	None
Note that by their very nature, infrastructure for water and sewage treatment is located close to rivers. It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.	Comments made on water and sewage infrastructure development have been noted.	None
Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as	The policy is clear that applicants need to consider flooding from all sources, which would include sewer flooding. It also sets out that an	None

a result of development where offsite sewerage infrastructure and capacity is not in place ahead of development.	FRA should demonstrate that the proposed development would not increase flood risk offsite.	
Policy is ineffective as development in Flood Zone 1 areas has caused by run-off, repeated flooding in Flood Zones 2 and 3. All development must demonstrate net-zero greenfield runoff rates to stop downstream flooding. Increasing and intensive urbanisation including transport infrastructure is a far greater cause of floods than climate change, yet it is not even acknowledged. Requirement of a proportional FRA for all flood zones including offsite cumulative risk, as well as ensuring that sites in Flood Zone 1, that are surrounded by Flood Zone 2/3 land would still require safe access/ egress during a flood event.	All sources of flooding must be considered for any site including risk of surface water flooding in Flood Zone 1. The Level 1 SFRA considers the cumulative impact of development on flood risk within the catchment. Safe access/egress to the site would be assessed as part of the planning application.	None
No development should be allowed in Flood Zone 3b. Should be a ban on development on low-lying Flood Zone 3 land as flood defences do not protect against groundwater flooding.	This approach could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing needs, which could come forward designed in a way that is safe from flooding, does not displace flood risk elsewhere, and is in accordance with the NPPF. All sources of flooding must be considered for any site, including groundwater.	None

Large commercial basements are unacceptable in any location in Oxford as they displace groundwater which floods downstream.	The policy states that proposals for basement accommodation within Flood Zone 2 or 3 will not be permitted due to the unacceptable additional risks associated with this type of accommodation.	None

Policy G8

POLICY	G8
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	G8				
All respondents **raising objections** on this policy/chapter	57.6	87.5	89.15	104.15	138.25
	140.2	157.1			

3009

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Any new development planned must be able to satisfy the council that it will not need to discharge surface water to combined sewers and that there is no risk of this happening, for example, by using overflow lakes/ tanks. The exceptional circumstances in e) need to be set out in detail for this policy to be effective.	Discharging to a combined sewer (and only in exceptional circumstances) is at the bottom of the drainage hierarchy, and it is expected that applicants would need to sufficiently demonstrate why all other options would not be possible.	None
The policy is too rigid. Below ground features such as underground tanks and pipes should be allowed in situations where site constraints exist e.g., groundwater, contamination, land-use efficiency, whilst still enabling SuDS to be used where appropriate. It is not always possible or practical to include swales and ponds in higher density developments. It would	Green SuDS are often considered at too late a stage in a scheme. If they are considered in the conceptual and design stages, they are more likely to be able to be well-designed into the proposal and not result in inefficient use of land. They can provide a multitude of benefits that grey SuDS can't, including providing open space for recreation, habitats to support	None

be helpful to understand why the proposed SuDS features are the ones that are considered acceptable to the Council and for this explanation and rationale to be provided. The first line of the policy should be amended after "All development proposals will be required where feasible" to allow for flexibility and include the following additional wording: *and* to *ensure efficient use of land* manage surface water through Sustainable Drainage Systems (SuDS)." Further flexibility should also be incorporated within the policy - green SuDS should be favoured but only "wherever possible". Development potential should not be restricted by SuDS.	wildlife and adaptation to other climate hazards such as overheating.	
Oxfordshire County Council has made a representation relating to Policy G8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy G8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
A Grampian condition for all development in Oxford should be required to ensure Thames Water can manage surface runoff.	It is not practical to do this - each planning application is assessed on its own merits.	None
No further development (including house extensions) should be permitted to connect to the Thames Water sewer network within the	It is not practical to have a blanket ban on development in the Lye Valley. Each planning application is assessed on its own merits.	None

Lye Valley fen catchment. Smaller extensions are only acceptable if they connect to a soakaway but not into the surface water drainage system. SuDS infiltration in Lye Valley is insufficient as a replacement for loss of natural surface cover.	Policy G8 acknowledges that infiltration will not always be the most suitable means of SuDS.	
Vague language used within policy. “Surface water runoff should be managed” does not define the actual target, which should be greenfield. Replace “should” be managed with “must”. Furthermore, “where feasible” and “where required” are not defined.	Whilst encouraging applicants to pursue certain elements of the policy may not have the same weight as requiring them, it is still considered important as a clear steer as towards how the Council would wish to see proposals addressing the topic of surface water runoff. Some aspects of the policy will be dependent upon the type of proposal, site context and other considerations and may not always be of relevance.	None
The policy is ineffective as it does not address chemical composition, a key factor in the flows into the Lye Valley SSSI and the other calcareous fen areas in the city.	This is a general policy for SuDS and is not meant to address individual areas of the city. The policy expresses that details of the SuDS must be submitted as part of a drainage strategy or FRA where required as part of a planning application submission. Furthermore, the ‘Policy implementation’ section of Policy G6 (Protecting Oxford’s Biodiversity including the Ecological Network) states that the City Council has published additional guidance in relation to the Lye Valley that applicants should refer to where applicable.	None
Support policy in principle. Highlight that it is the responsibility of the developer to make proper provision for drainage to ground,	Comment noted – the SuDS policy sets out various requirements which seek to ensure an appropriate drainage strategy is pursued	None

watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximize the capacity for foul sewage to reduce the risk of sewer flooding.	including prioritising green, multifunctional SuDS features where possible before other options.	
Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system.	Policy R5 (Water resources and Quality) sets out requirements for separating foul and surface water on new development and encourages applicants to take opportunities to separate these on existing development.	None
SuDS not only help to mitigate flooding but also improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.	The second bullet of the 'Policy context' section has included examples of the additional benefits of SuDS.	None

Policy G9

POLICY	G9
All respondents **supporting** policy	140.3

COMMENT SUMMARY	OFFICER RESPONSE
Thames Water support Policy G9 (d) where it refers to water efficiency in line with our comments to Policy R5.	Support is noted, thanks.

POLICY	G9
All respondents **raising objections** on this policy/chapter	No representations were made raising objections to this policy.

Chapter 5

General comments relating to Chapter 5

POLICY	General comments
All respondents **supporting** policy	43.9

COMMENT SUMMARY	OFFICER RESPONSE
No comment left.	

POLICY	General comments
All respondents **raising objections** on this policy/chapter	93.6

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
This is regarded as unsound with specific reference to drainage in New Marston and the impact that additional housing development will entail. It is noted in chapter 4 that reference is made to addressing flood risks and managing drainage particularly during wetter winters which are a feature of the changing climate. The current drainage system in New	There are policies in chapter 4 which seek to ensure new development takes into account flood risk from all sources and responds appropriately (Policy G7), incorporates SuDS (Policy G8), and mitigates impacts on water resources and quality (Policy R5).	None.

Marston (South) is not adequate: there is frequent flooding in winter with significant sewage overflow. During the winter of 2025/26 foul water (containing sewage) was a frequent occurrence in Ferry Road in New Marston (South), causing danger to health for those living in the road and those accessing the centre of Oxford via the busy cycle and walking route from Marston and Northway which crosses the bottom of Ferry Road. Additional housing proposed for New Marston will exacerbate local flooding problems and foul sewage will continue to cause ecological damage to New Marston Meadows SSSI, if this is not addressed.		

Policy R1

POLICY	R1
All respondents **supporting** policy	118.7

COMMENT SUMMARY	OFFICER RESPONSE
West Oxfordshire District Council has made a representation relating to policy R1, which is summarised and responded to in the Statement of Common Ground.	Support welcomed.

POLICY	R1				
All respondents **raising objections** on this policy/chapter	12.2	47.12	48.1	51.3	57.7
	86.6	87.6	105.3	112.8	117.6
	124.3	130.7	133.5	137.2	157.11
	159.11				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The policy proposes an energy hierarchy that is outdated with respect to the City's own policy and the Government's recent Warm Homes Plan, both of which recognise that building heating needs to be very largely decarbonised on the timescales of this plan. This requires that elimination of fossil fuel use is the over-arching priority. The Policy as drafted also fails to recognise that electricity will soon be largely decarbonised and therefore that electrification	The energy hierarchy is a well-known framework for guiding the design of buildings, which seeks to limit energy use through good design before considering how energy is used and sourced. The version set out in the policy follows the recommended structure set out by others such as in the National Design Guide and the LETI. We disagree that it conflicts with the Council's own policies or national ones.	None.

and heat networks will play a key role in dense developments where provision of 100% of energy via onsite renewables is not feasible. And the reference to offsetting is unclear and potentially misleading. Suggested change needed is a formulation of paragraph a) more consistent with 'radical reductions in greenhouse gas emissions' that would read: "*new buildings should be designed to be net zero carbon in operation, by eliminating the direct use of fossil fuels, and ensuring that all energy demands are met by the use of renewable energy (including efficient use of energy from grid electricity and low-carbon heat networks). Developments should use highly efficient fabric and energy service systems, and maximise the use of onsite renewable energy with the remaining energy from low-carbon sources, including the electricity grid and low-carbon heat networks. Net energy imports should be matched by support for offsite local renewable energy projects*."	The policy is clear in criterion d) that fossil fuels should not be used to directly power the building, its position in the list of criteria does not equate to its priority and it is of equal relevance to the other parts of the policy. The policy is technology agnostic, allowing applicants to select the most appropriate technologies to meet their energy needs and the performance targets of the policy in line with the particular context of the site and their proposed development. The supporting text highlights various options that could be taken on, including referencing heat networks of various scales where these would be the most sustainable option. We respond on the topic of offsetting later in this table and refer to that for our response on this issue.	
Policy contains potential logical "escape clause" that could render its targets ineffective, specifically, the EUI targets are allowed to be exceeded if "demonstrated to be technically unfeasible". Given that the plan's primary economic driver is R&D and laboratories—which are noted as having "exceptionally high operational energy demands"—this loophole could apply to a vast majority of the new non-	The policy's targets have been guided by recommended standards being developed across industry (e.g. the Net Zero Buildings Standard) and which are considered to be technically feasible in most instances, as evidenced through the range of feasibility studies conducted by authorities across the country. Nevertheless, the Council acknowledges that the requirement for	None.

residential floorspace proposed. If the most energy-intensive new buildings are exempted from the EUI targets, the city's 2040 net-zero target may be mathematically unsound.	delivering net zero carbon buildings in operation is likely to be challenging in some situations and it is considered to be pragmattic to acknowledge that there may be cases where the targets are not feasible. This is most likely to occur with some non-residential uses, as whilst significant efficiencies can be secured through good design, the energy demands associated with operational needs can be difficult to negate (e.g.specialised equipment associated with labs/research and healthcare). Hence, the policy explicitly allows for applicants to justify higher energy targets where the policy requirements can be shown to be technically unfeasible. This was felt to be the most practical approach to framing the policy, whilst also seeking to ensure that all other elements of the policy have been met, including that efficiency measures have been maximised as far as possible.	
There is an internal tension between the "net zero by 2040" objective and the practical operation of the viability cascade, weakening the Plan's climate ambition in application. S1 and Chapter 5 text treat offsetting and net zero standards as central to strategy, but S4 structurally treats offset contributions as the first thing to be sacrificed when viability is challenging.	Whilst the viability cascade does identify that, where an applicant can demonstrate the development to be unviable, payments towards energy offsetting can be reduced incrementally, it is clear that the development itself must remain free of fossil fuel use to ensure that it is net zero carbon ready and does not conflict with Net Zero Carbon targets for the city and nationally. We feel that this is an appropriate balance between recognising that there can sometimes be exceptional costs that could not have been anticipated in the whole plan	None.

	viability assessment, whilst also ensuring that new development is still held to appropriate minimum standards so as to not conflict with local and national net zero objectives.	
Generally support the policy and welcome the metrics for space heating and energy use intensity listed. These use absolute targets and correlate closely to Passivhaus standard criteria. Flag that working to the Passivhaus standard is the best way of guaranteeing that projects achieve these desired outcomes, without the performance gap, while also delivering good comfort and indoor air quality for occupants. Without the quality assurance provided by standards like Passivhaus, projects are unlikely to deliver these performance outcomes in reality. Would suggest that projects targeting Passivhaus certification could be said to be 'deemed to comply' with the Local Plan requirements and that this could be acknowledged in the document text.	The policy seeks to ensure that proposals are highly energy efficient by meeting the minimum EUI and space heating targets set out in the policy without requiring applicants to pursue any particular wider certification over which the Council has no control/influence. We would be happy to signpost to broader certification standards and best practice such as Passivhaus through the Technical Advice Note which is intended to be published alongside the Local Plan to provide additional guidance to applicants however.	None. We will consider how best to signpost to Passivhaus certification through the Technical Advice Note in due course.
Regarding criteria (a), flag that in relation to requirement for renewables to be ideally onsite, there is not enough space on-site to generate the significant amounts of energy manufacturing requires which will force some uses to utilise offsite solutions. Suggested change to criteria a - meeting all energy needs through renewables sources, ideally generated onsite, or <u>sourcing renewables elsewhere or</u> else offsetting as a last resort.	The policy already includes mechanisms that allow for applicants to pursue offsite solutions where meeting energy demand through renewables onsite is not possible – these are set out in criterion e). The suggested additions are not considered necessary.	None.

Regarding criteria (c) the requirement is for space heating demand to be no more than 20 kwh/m2/yr. This would not be achievable in manufacturing due to the exceptionally high energy demands. Suggested change to criteria c – targets expressed should be clarified as only for non-manufacturing uses.	The review of technical feasibility studies as set out in the net zero carbon literature review indicated that the 20kwh/m2/yr space heating target should be generally achievable across residential and non-residential uses. It is acknowledged that there can be great variaiton in typologies of non-residential development which may not have been fully captured through these studies, of course. We would, however, question the concern here as it is generally expected that higher energy demands associated with an operational use like maufacturing would impact upon the ability to meet particular EUI targets (criterion b)) rather than the space heating target (hence the differing targets allowed for through criterion b). Nevertheless, where exceptional circumstances arise and a particular proposal can evidence that this particular target is not technically feasible, the policy sets out through criteria g) to i) how a case for non-compliance will need to be justified.	None.
Regarding criteria (e), concern flagged that whilst energy storage is possible, it is not always practical or cost effective, and also, maximising available onsite renewable capacity may not be practical or cost effective. Suggested changes to two parts of criteria e as follows: • Criteria e - accompanied by energy storage where possible and cost effective.	The policy does not require proposals to be accompanied by energy storage, only where possible, as such, the additional caveat about cost effectiveness is not considered necessary. On the second bullet point, it is not entirely clear what is being suggested with the additional wording proposed. Whilst the policy allows for applicants to deliver renewables offsite, it is considered important that this land is under the applicant's control and that it	**Modification proposed to bullet point 6 of the 'policy implementation' section of the supporting text to improve clarity as follows:** *There may be circumstances where certain requirements may not be technically feasible onsite. Proposals could include delivery of additional renewable energy generation offsite on land under the applicant's control in order to match any deficit of delivery onsite. As a last*

• Criteria e - applicants should seek to maximise available capacity onsite, before seeking to meet the remaining energy balance through installation or purchasing of sufficient additional renewable generation at a location offsite	would come with some certainty that they would be able to ensure these offsite renewables are delivered. If the Council were to allow for simple purchasing of renewable generation elsewhere e.g. via a separate organisation, there could be challenges with assessing the application and monitoring delivery, potentially reducing effectiveness of the approach. As such, we do not agree with this amend either, though would suggest a mod to the supporting text that could help with clarity on this point.	*resort, an element of offsetting can help deliver on the aims of the policy. Before offsetting will be accepted, the applicant must robustly justify that the earlier steps in the energy hierarchy have been exhausted and onsite/offsite energy generation is not possible to meet the development's EUI figure. Only then, will payment be accepted into the City Council's offsetting fund to mitigate remaining energy use via retrofitting of buildings elsewhere in the city.*
Strongly welcome the move for all new buildings being net zero and fossil fuel free and agree with the energy hierarchy, however, for this policy to be effective and enforceable, it is vital that wording is changed from ''All new buildings SHOULD be net zero carbon in operation'' to ''All new buildings WILL (OR MUST) be net zero carbon in operation''	In the context of the Local Plan's policies the term 'should' is generally taken to mean that applicants must follow the requirements, unless there is strong justification for not doing so, and this is the case for policy R1. The policy is worded in a way that applicants are expected to follow the requirements which would ensure a building is net zero in operation, however, it is acknowledged that that there can be circumstances where this might not be possible and the policy sets out what is expected if they cannot, e.g. where meeting a requirement is technically unfeasible as is the case under criterion b, for example. As such, we would suggest that the wording as it currently stands is most appropriate to ensure an effective policy. However, on further review, we do think that the use of the term 'must' in the following sentence (in relation to Energy Statements)	None in relation to this comment, however, **we propose a mod to the second sentence of the policy to improve consistency and clarity as follows**: *All new buildings should be net zero carbon in operation~~. This must~~and this will need to be demonstrated through submission of an Energy and Carbon Statement that details how all the criteria below have been met:*

3021

	perhaps leads to some confusion, and propose to amend this to ensure better consistency.	
Whilst supporting the policy wording enabling higher EUI target for non-residential uses with exceptionally high energy demands, including R&D/labs/hospitals, object to the wording relating to expectations for how energy needs will need to be met (criterion e)). It is wholly unrealistic for all energy needs for lab buildings to be met on site through renewable energy. Integration of energy storage could conflict with the effective use of land and is arguably incompatible with high quality design and placemaking requirements. With Oxford's land constraints, also wholly unrealistic to deliver additional renewable energy generation at a location offsite, particularly in absence of any site allocations for renewable energy generation. Only option would therefore be payment into offset scheme, however, it continues to remain unclear from the papers available at this stage how the Council will utilise these contributions within the City and no fund, or schemes have been established to ensure that the contributions truly deliver necessary offsetting. Approach conflicts with exiting national policy/PPG, which does not require all energy needs to be met onsite, as well as the draft NPPF, which seeks to limit setting of local standards for energy efficiency due to concerns about proliferation of varying standards across	National targets as set out in the Climate Change Act require the UK to be net zero by 2050, and the city's local target aims for 2040. This means all new development needs to be net zero carbon in operation going forward to save from undergoing potentially costly retro-fitting in future. A net zero carbon building in operation meets all of its energy needs through renewable sources. There are various benefits to seeking to secure those energy needs through generation onsite (including reducing energy bills, reducing peak demands on the grid, boosting energy security), however, the policy does not require this. When coupled with energy storage, onsite generation become more efficient by being able to meet energy demands when the source of that energy generation is not available, but again, the policy does not require this. Whilst the policy is clear that offsetting is to be used as a last resort, we have sought to allow for this as a further option where meeting energy demands is not feasible through other solutions. • *We address comments on the offsetting mechanism further down this table, please refer there to a more detailed response that addressed these comments specifically*.	None.

local authorities. Council should acknowledge the Government's concern and align with the national net zero carbon agenda and timescale, in line with the principles in the proposed Future Homes/Buildings Standard. This will meet the objectives of the plan but does not put further financial obligations on high growth sectors such as life sciences. Suggest that Policy R1 should be amended to require developments to comply with Building Regulations.	• *In relation to alignment of the policy with national policy and the draft NPPF consulted on earlier in 2026, please also refer to separate response further down this table.*	
OUD has made a representation relating to policy R1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Whilst supporting the ambition, the need for flexibility is still required as the policy remains too rigid. A more flexible approach would be supported.	There is an importance balance to be struck between flexibility that can account for the variety of proposals that could come forward in the city and the need for an effective policy which ensures new development is fit for a net zero carbon future. Through the various criteria in the policy we are comfortable that we have incorporated as much flexibility as possible with various mechanisms available for circumstances, for example, where operational energy demands vary across non-residential typologies (e.g. criteria b)), where the ability to meet renewable energy generation onsite is constrained allowing for offsite solutions or payment into the offsetting mechanism (criteria e)).	None.
Linked to above point, a suggested more flexible approach would be focusing on	Omitting unregulated energy loads ignores a significant proportion of a building's total	None.

regulated energy which encourages additional measures for unregulated energy rather than it being a requirement. The alternative option would be to allow developers to focus on regulated energy, avoiding impractical on-site renewable requirements and enabling a more feasible route to net zero.	energy demand, which in turn, introduces greater risk of 'performance gap' issues (whereby the development as built performs significantly worse than predicted in terms of energy efficiency). It is considered important to ensure these are factored into the design process, thereby capturing a more accurate picture of total operational energy demand as would be measured at the meter, as this will help to drive more efficient design, with sufficient renewable energy generation to match all energy demands and thus delivering a truly net zero carbon building in operation. As noted earlier, the policy does not require all renewable energy to be generated onsite if site constraints would prevent this.	
The Council should be able to demonstrate that the Local Plan's aspirations do reflect the Government's policy for national technical standards. Others raised that it was not considered that the approach set out in R1 is consistent with the 2023 WMS, or policy PM13 of the recently consulted on NPPF, nor that the implications of such a policy have been properly assessed in the supporting evidence base. The policy should be deleted.	We are aware of the 2023 WMS and the content of policy PM13 of the draft NPPF, to which the Council submitted a strong objection during the consultation. The Planning and Energy Act currently still enables local authorities to set their own energy efficiency standards for new developments, and we feel that there remain imperative reasons for doing so. Relying on national standards alone, even with the uplift that will be brought in through the Future Homes and Buildings Standard would not deliver truly net zero buildings in operation. The local policy is therefore important for supporting the local net zero target of 2040, as well as the national net zero target.	None.

	Additionally, it will minimise the number of buildings that will require retro-fit in future; as well as reducing exposure of future occupants to risks of fuel poverty and improving local energy resilience. The background paper sets out the wider justification for the policy approach and the whole plan viability testing has ensured that viability impacts are considered alongside other policies in the Local Plan. The concerns set out by government in previous justification for the 2023 WMS as well as the draft policy PM13 in the new NPPF appear to relate to limiting the proliferation of different local standards nationally. However, the approach proposed in policy R1 is consistent with net zero carbon policies that are increasingly being tested and found sound at examination across the country and as is recommended by various national bodies.	
If the Council has the evidence to show that the policy is deliverable, they will need to ensure that all other policies in the local plan are consistent with delivering the levels of embodied carbon being proposed. The most energy efficient design will inevitably lead to less variety in the built form in order to reduce the surface area of the building. This will need to be reflected in design policies and any design codes that are produced to ensure that development is not refused for seeking to meet energy efficiency standards but, for example,	It is acknowledged that the design process will need to adapt to better accommodate performance standards of buildings that are net zero carbon in operation. We have set the policy to be as flexible as possible to enable variations in site context and needs of different proposals whilst still requiring key performance standards to demonstrate net zero in operation. We have also sought to ensure that net zero carbon considerations (as well as other sustainability objectives) are weaved through the design checklist which supports the Local	None.

not being designed in the character of the local area.	Plan's high-quality design policy, this will help to ensure that these considerations are factored in upfront alongside other design considerations. A similar approach is followed in the National Design Code which equally expected carbon reduction and energy efficiency to be a key part of high quality design.	
The policy will be a significant uplift, requiring further surveys and reports to be prepared to accompany planning applications. It will in turn require specialist officers at the Council to review and interpret the reports and the Council must be appropriately resourced for this.	Comments noted, we agree resourcing and training will indeed be important.	None.
Removal of BREEAM is disappointing as many projects are already working towards this, so consideration should be given to a phased transition as significant design changes will be needed.	As noted above, the policy seeks to ensure that proposals are highly energy efficient by meeting the minimum EUI and space heating targets set out in the policy without requiring applicants to pursue any particular wider certification over which the Council has no control/influence. We would be happy to signpost to broader certification standards and best practice such as BREEAM through the Technical Advice Note. The policy will apply for all applications validated after the Local Plan's adoption, however, the examination process takes time and applicants should have a good understanding of the direction of travel well in advance of adoption. It is generally expected	None.

	that if proposals have already begun the process of designing to BREEAM standards, this should not prevent them from being able to achieve the performance standards set out in policy R1.	
Targets set out in Criteria 2 of the Policy are completely unachievable for life science buildings such as those being built at Oxford North. Targets should be evidence based and it is unclear how the current targets have been set. A range of targets would be one way to set targets or simply seek scheme to minimise total energy use for the particular building in question. Suggested changes in relation to these points are to either delete the Energy Use Intensity targets or set a range. Also to provide more flexibility in the policy to allow for varying occupier demands.	As detailed in the carbon reduction and net zero background paper (BGP.008), in setting the specific targets for the total energy demand/EUI and space heating requirements, the Council has considered a range of sources. This includes recommendations from national industry best practice from a range of organisations. It also includes a review of technical feasibility studies produced to inform similar adopted or emerging Local Plans from local authorities across the country (as summarised in the separate Net Zero Carbon Technical Feasibility literature review), as well as previous engagement responses on the development of the Local Plan (and the withdrawn Local Plan 2040). The Council considered further breaking down targets by typologies (beyond just residential and non-residential) however this would invariably struggle to capture every potential eventuality. As such, keeping the distinction broader, with a more relaxed target for non-residential which could accommodate the potential range of different typologies of development and their higher energy demands, was considered most pragmatic.	None.

There is a difficulty in how a building is used and how that might change over time and this is a concern with post-occupancy monitoring. If data is collected how will the City Council use this to better inform other projects? Suggestion is to remove the need for post-occupancy monitoring as this is totally dependent on how each building is used by an occupier.	Specifying an approach to post-occupancy monitoring through policy is challenging and will depend upon the specifics of the application and intended future use of the building. The policy's criterion f) allows applicants to propose how this will be undertaken which leaves flexibility for them to propose the most suitable approach that will work for them. Nevertheless, it is important that some system is in place which will allow for post-occupancy monitoring of the performance of the building against the predicted performance at the design stage. This data could then be drawn upon not only to understand compliance with the policy targets, but also to investigate issues around the performance gap, as well as to provide transparency to future occupiers about the performance of the buildings.	None.
Several comments flagging need for further consideration to be given to the requirements of Policy R1 criterion e). The delivery of an on-site solution to meet all energy needs inevitably means designing a system for meeting peak demand. This is grossly inefficient given that the demand profile would rarely match the generation capacity. On most occasions therefore this would require a high proportion of the energy generated on-site to be exported to the grid. However, given the grid constraints that exist in Oxford this would result in most instances with the energy generated going to	Matching energy demand with renewables, ideally onsite, is a key element of net zero carbon buildings in operation. The policy does allow for offsite solutions where matching energy demand through renewables onsite is not fully feasible. Whilst there is invariably additional cost for designing to net zero carbon, the viability considerations have been considered as part of the Whole Plan Viability report (Dec 2025). Whilst area-wide approaches will undoubtedly play a role in supporting the city's transition to net zero carbon, every new development can	None.

waste. Additionally, the cost of implementing such technologies on site is expensive and would further add to existing challenges to financially viability. An area-wide approach, such as through Local Area Energy Plans, is the more appropriate means by which to achieve the objective of the policy.	have an impact and the policy seeks to ensure that negative impacts are mitigated as far as possible and that they are designed in a way that supports the city's transition.	
In relation to requirement for onsite energy generation, of those technologies which are most likely to be applicable (e.g. solar pv, batteries and turbines) only work best when they're sized to cover about 30–40% of a site's energy use. This is because available technologies do not perfectly match / align with a site's energy use profile. Scaling up % of generation would mean most of the energy created would be exported to the grid rather than used on site, and in many cases, that energy goes to waste because Oxfordshire is experiencing a severe lack of grid capacity, which would be needed to absorb this export. Whilst technically feasible to meet the requirement, it would also be very expensive and make some projects unviable. Additionally, trying to meet 100% of energy demand is very difficult due to variation in generating capacity (e.g. different levels of sunlight across year). This is not considered the best approach to address carbon emission reduction.It is suggested that the requirement is reworded to require a minimum of 30% of* all energy needs [(matching the development's total EUI figure)] to be met through onsite renewable energy generating technologies and that where the	As set out above, seeking to match energy demand through equivalent renewable energy production is a key element of net zero carbon building design. This also has other benefits in terms of reducing peak energy demand on the grid, and supporting occupant's bills. When coupled with energy storage this has additional versatility (which is highlighted but not required by the policy). Reducing the target to a minimum of 30% of energy needs would effectively lower the baseline target for all new developments and could result in missed opportunities where the full capacity could be achieved onsite. Of course, whilst the policy sets out that renewable energy provision should ideally be onsite, this is not the only route that is available to applicants. There are also options of exploring offsite solutions, or, as a last resort, making a contribution towards the energy offsetting mechanism.	None.

total energy need cannot be met through onsite renewables, applicants should seek to maximise available capacity onsite before looking offsite. The Energy and Carbon Statement should demonstrate that offsite provision has been fully secured and will be in operation upon completion of the development.		
Concern that costs for meeting the policy requirements alongside various other requirements of the Local Plan – e.g. affordable workspaces, increased CIL, other S106 costs - have been taken into consideration in determining the viability of the development being promoted through the Local Plan, as is required by the NPPF expectations for plan-making.	The development of the policy has been informed by viability testing alongside other policies in the Local Plan. This is detailed in the Oxford City Council: Local Plan Viability Assessment Update (Dec 2025).	None.
Not aware of any precedent for offset payments based on operational energy models.	Previously, the more common approach amongst similar policies elsewhere has been *carbon* offsetting, whereby a price per ton of carbon not mitigated through design is paid into an offsetting scheme. As the policy focuses on energy efficiency and achieving an operational energy balance as part of net zero carbon design (by matching energy demand with equivalent energy generation), the offsetting mechanism is tied to the deficit in energy generation (which in turn impacts the bulk of carbon emissions associated with a building in operation). This was considered to more closely align with the objectives of the policy.	None.

On Criteria (f), there is reference to offset payments being made, however, no evidence is provided or mechanism given for the calculation of offset payments based on operational energy models. The level of off-setting payment needs to be known to fully understand the implications on the viability of projects and more details on where the funds would be spent should be set out. An Appendix should be included in the Local Plan to provide the mechanism for the calculation of offset payments based on operational energy models.	It is expected that the offsetting fee will be published on the website and updated when necessary (e.g. to reflect inflation). This will give applicants clarity on pricing in advance. The draft process for calculating the offsetting contribution is set out in the Reg 19 carbon reduction background paper (BGP008 – pages 18/19) and would ultimately be published as part of a Technical Advice Note. The way the fund will be managed, and the fees utilised for projects, will be further developed as the Local Plan progresses towards adoption, though this is a separate workstream to the Local Plan's development itself. It will be important to ensure that the funds are utilised as effectively and transparently as possible, and to fund projects which deliver true offsetting within the city.	None.
NHS property could benefit from carbon offset funds collected where on-site carbon mitigation requirements cannot be met. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.	Suggestion is noted – as noted above, the way the fund will be managed, and the fees utilised for projects, will be further developed as the Local Plan progresses towards adoption, though this is a separate workstream to the Local Plan's development itself.	None.

Policy R2

POLICY	R2
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	R2				
All respondents **raising objections** on this policy/chapter	15.2	40.7	86.7	87.7	105.4
	112.9	114.6	130.8	139.8	157.12

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
No recognition of the impacts of construction traffic on residents, health and wellbeing, and heritage assets. Policy should reference minimising impacts in respect of air quality, noise and vibration.	Impacts from construction are addressed separately through policy R8, there is no reason to repeat them here.	None.
Various comments raising concerns with criterion a) of the policy including that: A blanket requirement to demonstrate that reuse is unfeasible may discourage the redevelopment and intensification of previously developed land, conflicting with national policy objectives (sometimes a building's retention might be feasible but not in best interests of site's future – e.g. if intensifying uses.) Also that it is unclear what constitutes 'robustly demonstrated to be unfeasible', and that this is	It is considered important for applicants to demonstrate that some consideration has been given to reuse of existing buildings, particularly where there are clear opportunities to retain and extend the lifetime of these assets thus helping to prudently use resources and limit carbon impacts. The Council has sought to frame the policy as pragmatically as possible, indeed the requirement does not force applicants to retain buildings and the third bullet point	A modification to criterion a) as follows: a) *Re-use of any existing buildings on a site has been explored and robustly demonstrated to be ~~unfeasible~~ contrary to the long-term sustainability of the site before resorting to demolition. This should include consideration of the impacts on carbon emissions.*

a potentially open-ended policy test which leaves the final assessment down to the judgement of the decision-maker at the end of the process, and lowers confidence in the planning application process. Suggested changes included that more clarity was needed. Also, that the future TAN should acknowledge that reuse may not always be feasible.	under the policy implementation section provides additional guidance for the kinds of situations where we would accept as justification for demolition. However, we agree that the wording of criterion a) could be tightened up by focusing it more strongly towards considerations of long-term sustainability, as opposed to the broader focus of 'feasibility'. We therefore propose a mod that would help to addres this. Additionally, we would be happy to explore further how we can provide additional guidance through the Technical Advice Note in due course where this would be helpful.	Amendments to the third bullet point under the policy implementation section of the supporting text as follows: *Whilst the policy does not mandate retention of existing buildings, criterion a seeks to ensure that applicants demonstrate that they have considered opportunities ~~whether it is feasible~~ for retention and re-use of buildings on a site, before resorting to demolition. Demolition would only be acceptable where it can be shown that their retention would be contrary to the long-term sustainability of the site. In the context of this policy, this means that r~~R~~eplacing buildings may be justified where the embodied carbon impacts are outweighed by~~, for example~~:*
Another suggestion relating to criterion a) was that this should be revised in relation to efficient use of brownfield land as follows: "Re-use of any existing buildings on a site has been robustly explored and demonstrated to be unfeasible, or where it is not making the most efficient use of brownfield land, before resorting to demolition"	We disagree with the proposed modification, as, in practice, we would expect every application to be making for more efficient use of brownfield land, thus this would effectively negate the requirements of the criterion for all such applications.	None.
Whilst principle of policy is supported, further clarifications are required as it fails to balance the longer-term operational benefits of delivering more sustainable buildings, which may outweigh the carbon impact of demolition. This may impact the ability to drive innovation and deliver a more sustainable built environment in the longer term. It is suggested	It is acknowledged that there could be a range of long term benefits which might outweigh the loss of an existing building. The third bullet point under the policy implementation section expands on the considerations that relate to criterion a) of the policy and sets out a number of reasons that could justify demolition. We feel that these comfortably capture the range	None.

that this could be addressed through minor revision of wording.	of considerations that might outweigh demolition and do not propose to further modify these. However, as noted above, we do propose some refinement of the wording of criterion a) along with bullet point three of the policy implementation section.	
In light of the absence of requirements for assessing embodied carbon in national policy or building regs, the Local Plan policy approach is supported in principle and considered to be proportionate/reasonable to enable flexibility for future development in the city. However, policy should be caveated to ensure that the redevelopment of sites to make the most efficient use of land is not unduly constrained by having to retain existing buildings.	Retention/reuse of existing buildings onsite is not a requirement of the policy, it simply asks that, where there are existing buildings, applicants explore and robustly demonstrate that their re-use is unfeasible before resorting to demolition. As such, we don't agree that a further caveat is required in the policy.	None.
Planning policy at a national level does not strictly prohibit demolition, nor does it suggest that carbon saving policies should be prioritised over the growth of the economy and innovation, as does the current Draft Policy.	The policy as drafted does not prohibit demolition, nor does it suggest a priority should be granted towards either objective. The policy simply seeks to ensure applicants consider the embodied carbon impacts of their proposal and actively take actions that can limit these. Additionally, we do not accept that seeking to deliver on one of these objectives (carbon reduction or economic growth) means that the other objective must be sacrificed.	None.
OUD has made a representation relating to policy R2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Whilst the importance of reducing embodied carbon in developments is recognised, there is nothing in NPPF to support policies that require	Whole life Carbon Assessments are increasingly being undertaken across the development industry despite the fact that	None.

developers to undertake whole life carbon assessments. These are onerous assessments and there can be significant inconsistencies in the outcome of any assessment due to the fact that not all products will have Environmental Product Declaration (EPD). This makes it difficult for consistent assessments to be undertaken across the developments which could in turn lead to inconsistent decision making. Suggest that the requirement for a whole life carbon assessment as set out in the second paragraph of this policy is deleted.	guidance and understanding is still emerging. The additional resources it can take to undertake Whole Life Carbon Assessment are acknowledged and this is why the threshold for proposals which would need to undertake them has been set at a level which engages only the largest applications. It is considered important that these larger applications make efforts to quantify embodied carbon and detail the reductions that have been secured through good design as these could have particularly significant embodied carbon impacts due to the size and scale of these proposals. The Council will be publishing additional supporting guidance for applicants to assist in preparing these assessments as part of the Technical Advice Note.	
No issue with principle of policy, the flexibility of not having any targets is welcomed albeit it is questioned how the City Council will assess the feasibility of re-use vs demolition and therefore if the policy will be effective.	Our proposed amendments detailed above should help to more clearly focus the requirements. The considerations in determining whether applicants have satisfactorily demonstrated that building retention would be contrary to the long-term sustainability of the site will naturally vary with each application and will be dependent on the particular site context and the condition of the existing buildings.	None.
Requirement for Whole Life Cycle Carbon Assessment will mean additional documentation to be submitted on application. Council should consider the resource implication for officers and for applicants. There is a risk this conflicts	We have considered and acknowledge that there will be additional resource demands. The threshold for requiring Whole Life Cycle Carbon Assessment is set at a high level so that it priorities the largest developments with	None.

with Government objectives to streamline planning system.	the potential for the biggest embodied carbon impacts. National policy is seeking to streamline the planning system, but it also includes strong objectives for mitigating impacts on climate change, and we believe that the policy as drafted accords with both of these objectives.	
It should be noted that at planning application stage it is not always possible to define the source of materials with any certainty, as this does not happen until a contractor is appointed, usually sometime after planning permission has been granted. As such certain elements of this policy should be conditioned and not required up front. Policy should be amended to acknowledge that information could be supplied either with a planning application or via condition where it is not possible to provide up front.	As much information is needed up front as possible to make an informed judgement about an application. It is not considered necessary to set out what will need to be conditioned and what should be provided up front, and this would be challenging to set out in policy in a consistent way. Where information cannot be sourced this will need to be explained through the application process.	None.
Support the general aims within Policy R2, but the Council must take a stronger position on sustainable development including embodied carbon in light of the current climate crisis. Whole Life Carbon Assessment should apply to development at all scales. Given national targets and the sustainable development goals within this Plan, it is important to understand the embodied carbon implications of all development.	It is important that policies are proportionate, justified and achievable, which the policy as written is considered to be. This is a new policy for the Council and it takes a significant step forwards on the issue of embodied carbon, intended as a stepping stone to potentially stronger requirements in future as understanding and approaches to dealing with these issues continue to develop nationally. Given the additional resource demand that will be required of applications to undertake Whole Life Carbon Assessment, and of officers in assessing applications, we have sought to	None.

	prioritise it as a requirement for the largest applications with the potential for the largest embodied carbon impacts in this Local Plan. There is, however, nothing preventing smaller schemes from undertaking it, particularly where this could help them to respond to other elements of the policy.	
This policy should explicitly set out that demolition is a last resort, especially when a building has not exceeded its expected useful life.	As other reps have pointed out, there can be good reasons why buildings may need to be demolished. The policy is clear under criterion a) that proposals should explore and robustly demonstrate that re-use is unfeasible before resorting to demolition. We are comfortable that this strikes the right balance between ensuring that buildings are not demolished needlessly before the end of their usable life, whilst accepting that sometimes their replacement can garner wider benefits.	None.

Policy R3

POLICY	R3				
All respondents **supporting** policy	57.8	81.3	139.9	159.23	130.9

COMMENT SUMMARY	OFFICER RESPONSE
As set out in the Statement of Common Ground, Historic England have made representations in support of policy R3, making clear that traditional buildings require a different approach to retrofit measures when compared with adapting modern buildings to improve their carbon and energy efficiency.	Support is welcomed.
Support, policy ensures that heritage assets and historic buildings are adapted sensitively to preserve significance.	Support is welcomed.
Policy aligns with Policy E1 to deliver further R&D floorspace on existing sites. However, concern flagged also in relation to not all buildings being suitable for conversion (*see summary of objections for summary of this issue raised*).	Support is welcomed.

POLICY	R3				
All respondents **raising objections** on this policy/chapter	12.3	86.8	130.9		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

Comments were made against policy R2, but related primarily to content of policy R1 (addressing range of issues including approach to energy hierarchy, that national grid will soon be decarbonised, approach to offsetting, and suggesting changes to wording) – these have been captured in Policy R1's summary and responded to there.	See policy R1 summary.	See policy R1 summary.
Not all buildings are suitable for conversion. Policy should be caveated to ensure site redevelopment to make the most of efficient use of land is not constrained by having to retain existing buildings.	It is acknowledged that not all buildings may be suitable for retrofitting. The policy sets out that retrofitting measures will be supported, unless other material considerations would make them unacceptable, taking into account the building's heritage significance, context, use etc. Furthermore, the policy does not require the retention of existing buildings; it aims to encourage the retrofitting of these buildings, where they are to be retained.	None.

Policy R4

POLICY	R4
All respondents **supporting** policy	57.9

COMMENT SUMMARY	OFFICER RESPONSE
Support, no comments.	N/A

POLICY	R4
All respondents **raising objections** on this policy/chapter	138.27

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
No acknowledgement of responsibility to tackle climate change by reducing factors leading to congestion and emissions. Policy and goals are ineffective without reduction of car parking provision at Headington Hospitals (JR, Churchill, NOC). Excessive staff car parking is responsible for air quality, health and environmental issues caused by daily traffic congestion in Headington. Total parking provision is double that of the entire city centre, 70% of which is for staff. Peak shift times correspond to peak traffic	Whilst addressing air quality can have important benefits for mitigating climate change by limiting transport related carbon emissions, this is not the focus of the policy. Parking provision at the hospitals, and addressing congestion more generally, are also not the focus of the policy, although measures taken to reduce air quality impacts are of course potentially related. Other policies address these topics as far as they are able to through the Local Plan (though it should be noted that the Council is not the	None.

congestion, and low-cost staff permits encourage car usage. Suggested changes: inclusion of environmental, social and health benefits of reducing traffic, not just air quality, mandatory reductions in on-site car parking, recognise negative contribution to global warming, no net increases in parking, 'mitigation' replaced by 'reduce' or net zero.	Highways Authority), e.g. policies C6-C8 in chapter 7 which address travel plans, car parking and cycle parking provision as well as site-specific allocation policies in chapter 8.	

Policy R5

POLICY	R5
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	R5				
All respondents **raising objections** on this policy/chapter	57.1	119.1	140.4	138.28	104.16

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The policy is too weakly/vaguely worded, fails the tests of soundness, and does not implement strong enough protection to at least maintain the existing state of watercourses in the city (e.g. Northfield Brook and downstream River Thames), of which the Council also has a responsibility.	The Local Plan 2036 does not include a separate water policy, but we have sought to introduce one for this new Local Plan specifically because we have identified the serious and ongoing concerns in relation to both water supplies and water quality. Water resources/quality is impacted by a variety of pressures, including new development (over which the Local Plan has a role) but also other factors e.g. the way land is managed, climate change etc. This means that the Local Plan is one of the tools for protecting watercourses, in that its policies can seek to ensure water is protected and that any potential impacts arising from new development are sufficiently mitigated, however, it is not the only one. The	None.

	responsibility is shared across multiple bodies (e.g. Thames Water, the EA, individuals). We are comfortable that the proposed policy meets the tests of soundness and responds appropriately to the need for protecting the water environment within the limits of what can be required/influenced through planning policy.	
The policy and the SA place a misguided level of trust in Thames Water to deliver on their promises, despite the ongoing uncertainty of delivering upgrades (which won't be complete until 2030) in context of their ongoing financial struggles and replacement of OFWAT. There is no justification set out as to when or how Thames Water will be able to adequately treat the increased sewage from any new development in Oxford. The policy should be based on a realistic appraisal of Thames Water's actual ability to treat sewage at the time any planning application is made and should take into account that little improvement is expected in this regard until 2027 at the earliest with 2032 the more likely completion date under current Thames Water proposals.	The Council has been regularly engaging with both Thames Water and the Environment Agency to resolve ongoing challenges facing the Oxford Sewage Treatment Works (STW), located just outside the city boundary. An announcement, published in 2025 regarding how the upgrades for the Oxford STW scheme had been agreed. The announcement set out that the Environment Agency "*ensured that Thames Water has now presented a clear, fully costed and funded programme of work, providing the confidence and certainty that water quality will be protected and communities in the area will have the water services they need, while allowing projected growth to come forward".* Thames Water publishes regular updates on the progress of the works on their website.	No further action proposed.
The Local Plan should require a Foul and Surface water drainage strategy for proposals of 10 or more dwellings (current threshold of 100 is too high).	The requirement seeks to ensure the largest developments go further to demonstrate how foul and surface water will be managed through a strategy because they could have particularly significant impacts. It is acknowledged smaller scale development can still have an impact and	No further action proposed.

	the policy still sets other requirements which seek to ensure that proposals of smaller scales of development demonstrate how they have mitigated impacts that are within their control.	
Policy R5 should set out that each planning application should be dealt with on its merits so far as the issue of likely discharge of foul water is concerned.	This is already the case for any planning application, irrespective of the policy, it does not need to be set out explicitly for this policy in particular.	No further action proposed.
All new planning applications must address the issue of water shortages which is clearly going to be a real problem during the timeline of the draft plan.	We agree that addressing future water supply is an equally important issue to water quality. The policy seeks to address both issues within the constraints of what can be influenced through the development process. The policy sets water use limits as far as is allowable through national policy restrictions on technical standards (i.e. by imposing the more stringent 110lppd water use limits). The policy also references other important water saving measures that proposals should explore, which will depend on the context of the site and what is proposed.	No further action proposed.
In relation to the improvements at Sandford Treatment works, the stages reached in the promised improvement works and the results from this should be monitored by the Council and the results made available for public inspection as part of the policy.	Whilst the upgrades to the sewage treatment works are an important step in addressing water quality concerns in the city, they are not directly in the control of this policy or the Local Plan and as such this would not be the correct mechanism through which to undertake the monitoring suggested. The Council continues to engage with Thames Water on the progress of the works separately, however.	No further action proposed.
The Policy should be revised to include wording to reflect existing legal means to restrict development where there is a likelihood of	As set out above, a scheme of improvements to the Oxford Sewage Treatment Works is in progress and this is expected to ensure that the	No further action proposed.

increasing the amount of dumping of sewage into our rivers and watercourse (e.g. by imposing suitable planning conditions at the stage where applications are approved by restricting for example the occupation of premises until certain criteria are met). The policy needs to be stronger in wording to link future development to the completion of committed upgrades at Oxford STW by Thames Water. This should include suitably worded Grampian conditions, preventing development above ground (this would allow enactment of the relevant planning permission but only to ground level) for all new planning applications discharging foul water to Oxford STW, until all committed upgrades at the works are completed by Thames Water, with confirmation provided by the Environment Agency. Without such conditions being imposed, OCC will fail to link new developments to necessary increases in sewage treatment capacity in any meaningful way, ensuring the continued decline in quality of local watercourses.	STW is able to accommodate the additional growth associated with the Local Plan. The Local Plan policy sets out that planning permission will only be granted for new development that utilises water supplies prudently and protects water quality. As with many policies in the Local Plan, if there is an impact from a development that could be mitigated through condition, the Council would consider this where appropriate. This is regularly the case with policies in the current Local Plan, such as in relation to dealing with contaminated land, it does not require this to be explicitly stated in each policy.	
Thames Water emphasize it is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. They recommends that developers engage with them at the earliest opportunity to establish the following: The developments demand for water	As set out above, where it is identified that an impact from a development could be mitigated through condition, the Council would consider this where appropriate, this does not need to be explicitly set out in the Local Plan. Equally, Thames Water, as a statutory consultee, is consulted on planning applications and is able to respond with recommended wording on conditions where a particular objection is identified.	No further action proposed.

supply and network infrastructure both on and off site; The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and The surface water drainage requirements and flood risk of the development both on and off site and can it be met. Additional wording (*see full rep from rep ID140*) has been provided as suggested mods to Policy R5 which includes: - setting out that permissions resulting in need for off-site upgrades will be subject to condition to ensure occupation aligned with the infrastructure upgrade, and - Wording to encourage developers to engage with Thames Water early, and also setting out that where capacity constraints are identified, the authority will where appropriate apply phasing conditions to ensure upgrades delivered ahead of occupation.	Following on from feedback at Reg 18 stage, we have incorporated wording into the supporting text of the policy that encourages applicants to engage with Thames Water at the earliest opportunity to establish the requirements for water supply and sewage/wastewater treatment network infrastructure both on and off site and ensure that these are planned for in due course. As such, we do not consider that these mods are necessary.	
Thames Water set out that Local Authorities should consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Additional wording (*see full rep from rep ID140*) has been provided as suggested mod to Policy	We have reviewed the proposed wording and are unclear on what added benefit this would bring. Policy S3, which Policy R5 also cross-refers to in its supporting text, already sets out clearly that *The Council will work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan.* This	No further action proposed.

R5 which would set out when development/expansion of water supply/waste water infrastructure would be permitted.	would include infrastructure associated with water supply or treatment of wastewater.	
Thames Water support the 110lppd water use limits referenced in the policy, which will help respond to the water stressed nature of the area. It is understood that this requirement is only applied through the building regulations where there is a planning condition requiring this standard. A condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered and suggest that Policy R5 should be amended to state: *".....Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met....."*	The second bullet point of the 'Policy Implementation' section already sets out that '*the requirement will be subject to a planning condition*', which addresses this comment.	No further action proposed.
Ineffective as Building Control, not Planning inspect this. A lot of this is in the Building Regulations, so pointless to repeat it here, at least as a policy.	The policy is required in order to ensure that the more stringent water use standards allowed for through Building Regs is enforced on planning applications. The policy also seeks to ensure applications consider wider measures as part of the design process that can support conservation of water resources and mitigates impact on water quality in the wider environment.	No further action proposed.
The Environment Agency have made representations against policy R5, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy R6

POLICY	R6
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	R6		
All respondents **raising objections** on this policy/chapter	120.9	89.16	138.29

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Soils need to be protected in a manner commensurate with their statutory status and identified quality, as such it is not considered justified to request such detail for applications at all sites.	All soils provide some level of benefit to the wider environment. The policy already recognises that quality of soil differs however, and, through criterion b, steers applicants towards avoiding impacts on higher quality soils in particular.	None.
It is questioned what the justification is for the proposed threshold of 10m³ for removal or dewater of peat and how this can be effectively monitored across the habitat.	In the absence of national policy guidance in relation to protection of peat, we previously engaged with our heritage team and Natural England to seek views on an appropriate threshold during the development of the now withdrawn Local Plan 2040. The threshold was set at what is considered to be a reasonable and pragmatic level, bearing in mind the	None.

	capacity of officers and also other requirements on applicants. After further review of the policy, including fresh consultation for the Local Plan 2045 Reg 18, we remain of the view that this is a suitable threshold in the context of these considerations. We will keep the effectiveness of the policy under review throughout the lifetime of the Local Plan	
The requirements of criteria a) to d) are often demonstrated in other parts of an application, rather than the Design and Access Statement or Landscape plans, for example, Geo-Environmental Desktop Studies, Construction Management Plans, levels plans. Amends suggested to change references from these docs to something more broad i.e. 'Application Documentation'.	For clarity and ease of reference, it is considered important that the information responding to the policy requirements can be easily located, ideally in one place. Equally, we acknowledge the concerns raised and do not want to force onerous repetition of information across application documentation. As such, we would propose a modification is made to incorporate an additional bullet point into the 'policy implementation' section of the supporting text that makes it clear that applicants can reference other documentation where the requirements are responded to.	**Mod proposed to incorporate an additional bullet point into the 'policy implementation' section of the supporting text as follows:** • *Whilst the policy seeks to ensure that all of the relevant information that would need to be referenced in order to assess how the requirements have been responded to is included in one place, applicants are welcome to make reference to other documentation in their application, such as Construction Management Plans, where applicable.*
Oxfordshire County Council has made a representation relating to Policy R6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Lye Valley catchment is at risk from same issues that affect other areas of peat. The policy is ineffective as it states within 200m not "where peat reserves on site or downstream can reasonably be suspected". State that there	It is important to note that this is a new policy for the Local Plan, formulated in response to previous consultation feedback identifying this as an important issue for the Council to address. Peat reserves are identified on the	None.

should be identification of Lye Valley, Dunstan Park, Headington Hill north slope (along A40) (Ruskin, Larkin's Lane Field), and other peat reserves as 200m is entirely arbitrary.	policies map, these are informed by British Geological Survey mapping which had previously informed Natural England's own peat maps. This mapping includes areas of the Lye Valley and Dunstan Park. The Council is aware of potential for unrecorded peat reserves elsewhere in the city which could be impacted by development, particularly in proximity to these recorded reserves. In liaison with Natural England previously, and in the absence of best practice, or suitable national guidance, we sought to identify a reasonable precautionary buffer around the recorded peat reserves where applicants would be expected to investigate potential on any undeveloped land (where there is more potential for undisturbed deposits). 200m was determined to be the most suitable size for the context of the city.	
Once a report is written, what are the metrics to permit or not permit the development?	As with other policies in the Local Plan, the policy sets out the requirements and applications will be assessed based upon the information provided in response to these. Some of the criteria will not be of relevance to some applications, depending on the context of the site and the specifics of the proposed development – the policy clearly acknowledges this.	None.

Policy R7

No representations received against this policy.

Policy R8

POLICY	R8
All respondents **supporting** policy	140.5

COMMENT SUMMARY	OFFICER RESPONSE
Support additional text at the end of policy R8. The odour impact study would establish whether new resident amenity will be adversely affected by sewage works, and it would set the evidence to establish an appropriate amenity buffer.	Support is welcomed.

POLICY	R8	
All respondents **raising objections** on this policy/chapter	157.13	85.6

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

General support of policy but concerns over wording which currently make it unsound and inconsistent with NPPF: - Under criterion a), 'protected' should be amended to "maintained but where any impact occurs it is offset by the benefits ... or through appropriate mitigation". - Regarding criterion b), the test set out at paragraph 116 of the NPPF is that development that results in "severe" highway impacts should be prevented; this should be set out clearly in the policy. - The second set of criteria in the policy simply comprise a generic list without any targets or standards. The policy should set out what is considered acceptable or not.	Suggested amendment to criterion a) is considered unnecessary as mitigation is covered under criterion c) where necessary. Suggested amendment to criterion b) is not considered necessary as Paragraph 116 of the NPPF refers to both "unacceptable" and "severe" impacts. Local policy is required to align with, not replicate, national policy. Regarding the second set of criteria, targets, standards, and what is considered acceptable is highly dependent upon the context of the application site, including location and type of development proposed. Each application would be considered on its own merit. Some elements of the criteria have their own specific policies which set out standards in more detail.	None.
Sport England have made a representation relating to Policy R8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Chapter 6

General comments relating to Chapter 6

No general comments received.

Policy HD1

POLICY	HD1		
All respondents **supporting** policy	157.19	159.24	

COMMENT SUMMARY	OFFICER RESPONSE
This should be proportionate to the location and setting of the proposed development. Albeit there is overlap with Policy S2 which should be amended.	Comment noted.
This should be proportionate to the location and setting of the proposed development, and also viability considerations.	Comment noted.

POLICY	HD1		
All respondents **raising objections** on this policy/chapter	77.2	78.6	138.3

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

Most of Oxford inside the ring road and outside the historic centre has good transport links and access to amenities and is therefore highly sustainable. This makes large swathes of the city suitable for much higher density development than is there now. And away from the Conservation Areas it is comprised of low density housing of no distinctive character; and should therefore be suitable for redevelopment at higher density which "creates local distinctiveness" rather than having to kowtow to local character. But we have found that planning officers use Policy HD1 and the local Character Assessments to prevent development that is different in style or scale from the (normally banal and profoundly undistinctive) context. So they use HD1 to trump HD2. The result is that the approaches to Oxford and the outer suburbs do not get developed, and if anything is built there it is low density and low quality.	Policies are not considered in isolation and the plan is to be read as a whole. Applications are also assessed on a case-by-case basis on their own merits. In deciding an application, officers consider the details of a proposal, the relevant policy requirements and the specifics of the location and setting. What may be suitable in one location does not necessarily mean it would be appropriate in another.	None.
The categories of development that are excluded from the requirements to be supported by a constraints and opportunities plan with supporting text and/or visuals to explain their design rationale, is too limited. They should be extended to exclude minor commercial developments which will have limited impacts on their context and do not need to be burdened by such requirements.	The excluded categories include householder applications and changes of use without external alterations. The policy as written allows for sufficiently broad flexibility to cover most works that would constitute permitted development for commercial uses. Comparatively, even relatively small-scale commercial development that goes beyond the criteria for permitted development will have a greater impact than householder applications.	None.

Is ineffective, as the vast majority of applications, namely, householder, are excluded from the necessity to provide even a basic rationale for the proposal.	Householder applications are usually at a scale that is small enough not to require assessment using the design checklist or would be within the scope of permitted development rights. A number of the principles are also unlikely to be applicable, e.g. urban design requirements. Making this mandatory for all householders would be an onerous approach that would not have significant value.	None.

Policy HD2

POLICY	HD2
All respondents **supporting** policy	129.7 157.2 159.25

3055

COMMENT SUMMARY	OFFICER RESPONSE
The expectation for high density development on gateway sites is supported, specifically densities over 80dph. It be important that the policy framework allows sufficient flexibility through the masterplanning process to optimise the capacity of these gateway sites, consistent with Policy HD2 and the expectation for efficient use of land.	The support is welcomed and comment noted.
Building at appropriate densities is an important component of sustainable development. Making efficient use of any land in the City is a priority. This	The support is welcomed and comment noted.

policy must be read in relation to the HD6 on building heights and our comments on changing net zero carbon to low carbon designs to align with the NPPF.	
The aims of this Policy are supported, including building at appropriate densities as it is an important component of sustainable development. Making efficient use of any land in the City is a priority.	The support is welcomed.

POLICY	**HD2**			
All respondents **raising objections** on this policy/chapter	15.3	57.11	87.8	138.31
	47.13	77.3	114.7	

3056

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
Not effective as insufficient recognition of heritage assets and proportionality. Add to policy: Proportionate design to recognise heritage assets, listed buildings and their settings.	The plan contains numerous policies which require high quality design (HD1) and consideration of heritage assets (HD3-5) which must be considered, where relevant, alongside Policy HD2.	None.
CPRE support this policy and the need to maximise density and the proposed/ suggested density targets stated within it. However, this Policy and these densities do not seem to then translate to the housing numbers on site specific allocations given later in the Plan. An exercise is required to cross reference the density targets in this policy against the	Allocated Sites have their own bespoke policies in the plan, which contain site and context–specific guidance on appropriate type and quantum of development and design requirements – including density.	None.

density and home numbers by site allocation , with adjustments made where these are too low.		
Not justified as the policy doesn't go far enough in requiring increased density on sites. The policy should require that outside the Conservation Areas any new development should be a minimum of three storeys and any development along the arterial roads should be a minimum of four storeys.	Density figures in the plan, unless otherwise indicated, are considered as indicative and minimum levels. In the case of site allocations, each site was individually assessed through an urban design led process. Individual schemes proposing higher densities than the indicated minimum figures would be assessed on their merits.	None.
Not justified as conflicts with Policy HD6 (Views and Buildings Heights) which sets out that planning permission will only be granted for development that will retain the special significance of views of the historic skyline of the Historic Core Area. Comment encourages the Draft Local Plan to recognise that large-scale redevelopment and regeneration projects need to acknowledge existing context but also can create new transformative contexts.	Development proposals can make efficient use of land and comply with Policy HD6 (Building Heights and Views), as such there is no conflict between these policies in principle. Applications will need to be assessed on their own merits and will need to be demonstrate how policies HD2 and DH6 are met in each specific instance.	None.
Not justified and not consistent with national policy as it is not appropriate for the policy to prescribe densities solely on the basis of broad locational categories. The appropriate density of any given site should be determined through a site-specific assessment that takes full account of its spatial context, opportunities, and constraints.	Density figures in the plan, unless otherwise indicated, are considered as indicative and minimum levels. In the case of site allocations, each site was individually assessed through an urban design led process. Individual schemes proposing higher densities than the indicated minimum figures would be assessed on their merits.	None.
Not effective as the policy fails to recognise the inefficiency of car infrastructure, roads, driveways and garages. Developments in	Car infrastructure is not inherently inefficient and therefore can be considered alongside all other elements of scheme design in terms of	None.

heritage areas, or places valued by the community, must be blocked if they cause significant harm, similarly, such developments must be of scale and form appropriate to their context.	whether it represents an efficient use of land, it does not require specific wording. The plan contains numerous policies which require high quality design (HD1) and consideration of heritage assets (HD3-5) which must be considered, where relevant, alongside Policy HD2.	

Policy HD3

POLICY	HD3	
All respondents **supporting** policy	15.4	139.1

COMMENT SUMMARY	OFFICER RESPONSE
Recognises the importance of heritage assets to Oxford. This policy needs to be accorded greater weight in the context of design and construction.	Noted.
General support – No reasons given.	Noted.

POLICY	HD3			
All respondents **raising objections** on	57.12	81.4	134.6	138.32

this policy/chapter	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Support the intent of the inclusion of point 'e' in the policy but feel that this is not strong and specific enough. Propose the addition of the wording "both outwards from the heritage site and inwards from the surrounding countryside to the heritage site"	Point c) of draft policy HD6 already covers this, requiring proposals to "have a positive impact on important views including both into the historic skyline and out towards Oxford's green setting". It is not considered necessary to repeat this in policy HD3.	None.
Historic England has made a representation relating to Policy HD3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Modifications proposed - Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Note that the draft policy states that 'substantial harm to or loss of significance of a conservation area should be wholly exceptional'. Consider that the word 'wholly' should be removed from the policy drafting as this is not consistent with the wording of paragraph 214 of the NPPF.	The NPPF provides a national context, this wording has been accepted by Historic England. No change required.	None.
In the third paragraph of the policy the statement "Substantial harm to..... of the NPPF can be demonstrated as set out in a heritage statement" is ineffective as it states that the developer's heritage statement is the only input used for determination, not input by the public or any other body, essentially, a developer only has to show it has been through the motions "informed, assessed, responds, explored etc" and that will be sufficient.	This is one required criteria. The draft policy also requires applications affecting a designated heritage asset directly or by affecting its setting to "be considered in line with the approach set out in the NPPF (National Planning Policy Framework) paragraphs 207-221 (or updated equivalent), whereby the level of harm will be assessed and weighed against the public benefits of the	None

Conservation Areas, as Designated Heritage Assets, are not up-to-date and ineffective as many have large sections destroyed, so should be drawn to new boundaries, removing areas that no longer have anything to preserve such as Headington Hill. Almost all development in Conservation Areas will confer substantial benefit, by for example, providing more housing which will always be claimed to be a "substantial public benefit" so Policy HD3 becomes ineffective – there is no recognition that similar benefits may be realised elsewhere for less social, cultural and heritage loss. It is contrary to NPPF Para 201 which states several tests to be met which are omitted in the policy.	proposal, and the relevant test in the NPPF applied in that context". The policy wording requires compliance with the NPPF paragraph 201, stating that: *Where a proposed development will lead to substantial harm to or loss of the significance of a conservation area, planning permission or listed building consent will only be granted if all of the criteria in paragraph 201 (or equivalent in any update) of the NPPF can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment.* Appraisals have been written for a number of conservation areas, some of which are currently being updated. These documents detail the locations and characteristics which contribute to each area's architectural or historic importance, as well as opportunities for enhancement. No change required.	

3060

Policy HD4

POLICY	**HD4**	
All respondents **supporting** policy	98.7	139.11

COMMENT SUMMARY	OFFICER RESPONSE
Overall policy is sound in providing a degree of protection given to assets such as the Milham Ford School building, which is on the Oxford Heritage Asset Register, is welcomed. But note with concern that protection may not be sufficient. See our comments on site SPE11 Oxford Brookes Marston Road Campus further in the New Marston (South) Residents Association submission.	Support noted.
General support.	Support noted.

POLICY	HD4			
All respondents **raising objections** on this policy/chapter	81.5	120.5	138.33	159.12

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy HD4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Modifications proposed - Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Draft policy wording states that "A non-designated building or group of buildings, monument or site, place or landscape will be considered a local heritage asset if it has local interest, value, and significance." Further it states that "These assets may be identified in a number of ways such as through the Oxford Heritage Assets Register, conservation area appraisals, or the planning application process."	Details about the Oxford Heritage Asset Register and qualifying criteria are provided on the City Council's website. No change is needed.	None.

Policy would be more effective and assist developers and decision takers alike, if some criteria upon which non-designated heritage assets pertaining to be 'local heritage assets' can be classified. Suggest a similar approach could be taken to that contained at Appendix G of the Cambridge City Local Plan (2018).		
Ineffective, as the goal seems to write a report rather than define the degree of harm that would acceptable – so "due regard, informed by, recording" give NO protection at all to these, this is not justified.	Proposals are to be considered on a case by case basis, and consideration criteria are set out in the policy. No change is needed.	None.
Policy HD4 is not consistent with NPPF paragraph 216, which refers to the "effect of an application on the significance of a non-designated heritage asset … in determining the application". Amend the policy to change references to 'local heritage asset' to 'non-designated heritage asset'. Amend third paragraph of Policy HD4 to read: "In determining whether planning permission should be granted for a development proposal that affects a *non-designated* [local] heritage asset *a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.* [consideration will be given to the significance of the asset the extent of impact on its significance, as well as the scale of any harm or	The references to 'local heritage asset' will be amended to be consistent with terminology used in national policy. The wording for the approach to assessing the impact of development proposals on non designated assets is considered to be in line with national policy and a change is not necessary.	Modification to amend references to 'local heritage asset' to 'non designated heritage asset'. No other action required on wording of policy.

loss to the asset as balanced against the public benefits]".		

Policy HD5

POLICY	HD5
All respondents **supporting** policy	139.12

COMMENT SUMMARY	OFFICER RESPONSE
General support – No reasons given.	Support noted.

POLICY	HD5		
All respondents **raising objections** on this policy/chapter	81.6	120.6	138.34

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy HD5, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
A minor administrative point, the draft wording of the policy inaccurately cross references to other policies within the Draft Local Plan. "Proposals which would or may affect	The cross references will be reviewed with the correct policy references.	Minor modification proposed.

archaeological deposits or features that are designated heritage assets will be considered against the relevant policy approach (Draft Policy HD2 Listed Buildings), Draft Policy HD4 Scheduled Monuments)." Suggest deletion of these cross references.		
Reads as if central Oxford is the only place of any importance. Headington is far older as a settlement and manor for example.	The policy does not only refer to central Oxford and the City Centre Archaeological Area. Although the policy is in several parts, it is considered that this is clear. Conservation areas such as Headington are also addressed in policies HD2 and HD3. No change is needed.	None.

Policy HD6

POLICY	HD6
All respondents **supporting** policy	81.7

COMMENT SUMMARY	OFFICER RESPONSE
As captured in the Statement of Common Ground, Historic England made a general comment in support of the policy as worded.	Support is noted and welcomed.

POLICY	HD6				
All respondents **raising**	40.8	114.8	134.7	138.35	139.13
	87.9	105.5	120.7	157.21	159.26

objections on this policy/chapter	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Not effective, justified or consistent with national policy as the policy does not clarify that a view is not a heritage asset and does not carry the same significance as a heritage asset does, as defined in the NPPF.	Views into and from within the city are important elements of the setting of heritage assets. The collection of buildings that make up the 'dreaming spires' are considered a heritage asset in their own right, and they do have special significance. There is sufficient detail in the supporting text that provides clarity to the policy, and there have been no objections to this specific wording from Historic England.	None.
Not justified or consistent with national policy because the policy treats any level of harm - regardless of scale, context, or mitigation - as automatically unacceptable. This approach conflicts with national policy and established heritage planning principles. This policy wording does not mention whether it can be demonstrated that the substantial harm or total loss to a designated heritage asset is necessary to achieve substantial public benefits that outweigh that harm or loss, as set out in the NPPF (Paragraph 214). Draft Policy HD6 should be amended to reflect the approach in the NPPF by enabling a proportionate assessment of harm and the weighing of that harm against public benefits.	The policy sets out guidance to inform design decisions about heights and to enable an understanding and detailed assessment of the impact of heights.	None.

Not justified as the policy make clear which part relates to sites within the Historic Core Area and designated View Cones, and which part of the policy relates to proposed 'tall buildings', or if necessary separate out the policy into 2 different policies.	The policy does not only refer to central Oxford and the dreaming spires. Although the policy is in several parts, it is considered that this is clear, especially as the second part starts 'Applications for any building that exceeds 15m...'	None.
Not justified because the policy refers to specific software (VuCity). It is not appropriate for a Local Plan to push a particular brand of software. This reference should be deleted and the policy simply refer to the use of an appropriate 3D model.	The LPA has a licence with VuCity software to view the submitted 3D models. Alternative or generic software may not be compatible with the Council's systems which is why the policy is specific in its requirement for VuCity.	None.
Not justified because we'd like to see a distinction made – either in this policy or its supporting text – between 'views' and historic 'setting'.	Policies HD3 and 4, in particular do carefully consider the setting of heritage assets and may also be of relevance, alongside Policy HD6.	None.
Not effective as it appears to only refer to central Oxford and the dreaming spires, not views for example into, and out of the Old Headington Conservation area, the language needs to be clearer that it applies to ALL of Oxford where views exist either in or out, regardless if listed as view cones or not.	The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. Although the policy is in several parts, it is considered that this is clear, especially as the second part starts 'Applications for any building that exceeds 15m...'	None.

Policy HD7

POLICY	HD7

All respondents **supporting** policy	124.4

COMMENT SUMMARY	OFFICER RESPONSE
Support of HIA for major developments with potential for significant health impacts	Support welcomed

POLICY		
All respondents **raising objections** on this policy/chapter	89.17	138.36

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxfordshire County Council has made a representation relating to Policy HD7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
States the assessment is ineffective because it does not set a target for compliance and is not clear how this is implemented for health impacts from increased traffic or loss of green space.	Appendix 6.2 directs to Oxfordshire County Council's HIA Toolkit which explains the process and what is required of a HIA.	None.

Policy HD8

POLICY	HD8
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	HD8
All respondents **raising objections** on this policy/chapter	77.4

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The final sentence should be removed. The rest of the policy places measurable limits on what is permitted to prevent buildings being overbearing. Then the last sentence gives officers a subjective catch-all if they think something is a bit too big. It is unnecessary and too open to interpretation.	The impact created by a building on its adjoining environment depends on the setting and context, which is not always replicable in all situations. As written the policy makes allowance for the use of planning judgement to determine if a building is appropriate for its location.	None required.

Policy HD9

No comments received.

Policy HD10

No comments received.

Policy HD11

POLICY	HD11
All respondents **supporting** policy	118.8

COMMENT SUMMARY	OFFICER RESPONSE
West Oxfordshire comment in support of the policy and have no soundness concerns. They note the suggestion in the draft new NPPF that local authorities should aim to achieve at least 40% of new housing to Part M4(2) or M4(3) standards. They say the impact on deliverability and viability is minimal so encourage a more ambitious requirement.	The support is welcomed. The policy approach does ensure that at least 55% of dwellings on sites of 10 or more would be M4(2)

3069

POLICY	HD11
All respondents **raising objections** on this policy/chapter	No representations raised an objection to this policy.

Policy HD12

No comments received

Chapter 7

General comments relating to Chapter 7

POLICY	General comments and omission policy
All respondents **supporting** chapter 7	161.2

COMMENT SUMMARY	OFFICER RESPONSE
National Highways has made a representation supporting aspects of Chapter 7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	General comments and omission policy				
All respondents **raising objections** on this policy/chapter	124.6	98.8			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
NHS Property Services recommend the inclusion of a comprehensive policy on healthy places with specific policy requirements to build	Having reviewed carefully the details of the requested policy, it is not considered that it adds anything to the plan that isn't already covered by another policy, and which wouldn't	None.

for healthy places, with criteria cross-referenced to other policies with appropriate level of further details in the supporting text. Extensive details of the requested draft policy are included in the representation 124.6	just add another layer of cross-referencing. The HIA policy already tries to bring together health impacts, requiring a submission that considers in the round impacts of proposals on health. The proposed policy would repeat that unecessarily, as well as simply highlighting through cross-referencing policies already in the Plan.	
The Chapter overlooks New Marston, a local centre with over 7,300 residents. New Marston has extremely limited facilities, with a pharmacy and some local shops, but no health centre, supermarket, leisure or community facilities. More housing means more people unable to access opportunities within a 15/20 minute walk. A bus at least twice an hour and within 400m should not be considered sufficient, and the destination of the service considered, as frequent changes to get to destinations are not acceptable. For example, the X3 that services New Marston and goes to the city centre does not serve the district centres of Headington or Summertown-reaching those by bus requires a change.	New Marston Local Centre is defined in Policy C1 and shown on the Policies Map and has a defined active frontage (Policy C2). This is to help protect what is there. Other policies in the chapter protect a variety of local facilities and set out criteria for where new facilities are proposed. Discussions with Oxfordshire County Council helped inform the criteria for a suitable bus service whereby car free developments would be accepted. The X3 from New Marston does serve the city centre, which has a wide array of facilities.	None.

3071

Policy C1

POLICY	C1

All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**C1**				
All respondents **raising objectio**	138.37	89.18	114.9	78.1	47.14
	30.12				

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
The area around the Ozone Leisure Centre/Kassam Stadium should be designated as a local centre as and when likely anticipated developments take place.	This site currently has some commercial leisure and town centre uses, but these are not local facilities that serve people locally and they are not currently well-connected by public transport. The uses are heavily car dependent and attract people to travel by car from a wide area. Other policies do protect leisure and cultural uses generally, but it is not considered appropriate to designate it as a town centre. As the character, accessibility and function of the area changes, this will be reviewed.	None.
Tight sequential and centre policies may constrain necessary non-central economic growth. The sequential approach is applied to all 'town centre uses'. At the same time, Policy E1 channels almost all new employment to key employment sites and city/district centres. This approach could unduly limit beneficial decentralised economic development (e.g.	The approach of focusing on town centres and requiring a sequential test outside of these is important to ensure sustainable patterns of development. If suitable sites are not available within centres, then it may be possible for use outside of the centres to be justified in accordance with Policy C1, assuming criteria a-c are met. Policy E1 does introduce further constraints on	None.

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
uses) in otherwise sustainable, accessible locations, especially if suitable sites in centres are not available.	employment uses in line with the strategy, which is to limit those uses to city and district centres, or existing sites in lawful use for those uses. This is important to ensure housing can be prioritised in other locations.	
Retail impact assessment threshold is relatively low at 350sqm, and significantly below the 2,500sqm threshold in the NPPF. It is understood this maintains the same threshold as the OLP36, but no up-to-date reasoning has been provided. It should be clear it applies only where there is an uplift in retail or leisure floorspace that requires	The overall aim of the plan is to ensure sustainable development. Key to this is ensuring sustainable travel patterns. Location of uses that attract people, such as retail, is key to their accessibility. Any proposals in less accessible locations could be particularly damaging to these aims, so the requirement for retail impact assessments from small out of town units is considered justified.	None.
Provisions should be included for securing contributions from appropriate out-of-centre developments to enhance the robustness of the city centre against out of centre competition more accessible by car.	Criterion b requires that impacts on the road network can be mitigated, and notes that this is likely to include by minimal parking. Criterion a requires good accessibility by walking, cycling and public transport. Development will not be permitted where it will have significant impacts on the road network by generating significant new car use, and therefore it would not be justified to automatically take contributions to enhance the city centre. Instead, potentially harmful developments are prevented.	None.
The criteria should consider the comparative accessibility of out-of-centre locations by non- sustainable modes of transport. Accessibility to the city centre is poor, especially since introduction of the congestion charge. If higher parking is necessary in out-of-centre locations this is a	Criteria a-c are intended to ensure that the accessibility of any out-of-centre location (if it can be justified through the sequential test and is in accordance with other policies) is considered, and that impacts on the road network are mitigated. Policy C8 regarding parking will still apply and good	None

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
locations. Higher public benefits are needed to outweigh the policy conflict. There should be a clearer retail hierarch, with the City Centre differentiated as the top tier. There should be reinforcement of the provisions for resisting out of centre development that would have a comparative trading advantage due to the availability of dedicated and prximal car parking and freedom	accessibility by walking, cycling and public transport is still required. The other centres are not considered out-of-town locations and are able to support a wide range of uses. They are all locations highly accessible by sustainable modes, with limited car parking. Further more, the traffic filters do not only affect the city centre.	
Oxfordshire County Council has made a representation relating to Policy C1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Headington District Centre should not include Bury Knowle Park as most of the uses are clearly inappropriate for Core GI. The primacy of G1 must be stated or a large building could be built in the park and conform with C1 (and remove Bury Knowle Park from the district centre anyway). The centre should include the backstreet behind Windmill Road where	Bury Knowle Park is protected by Policy G1 in line with the rest of the Core GI network. This is not overridden by the district centre boundary. The park was included as it is a key attraction of the local centres and includes community facilities such as the library. The district centre does not need to expand to include any facility or shop within the vicinity of it.	None.

Policy C2

POLICY	C2
All respondents **supporting** policy	139.14

COMMENT SUMMARY	OFFICER RESPONSE
Support reference to increased residential development, including upper floors of commercial premises; it is considered that this should be echoed in other housing-related policies to reinforce the contribution that provision of residential units in city and district centres could make toward the delivery of dwellings in sustainable locations. Support reference to public realm.	Support is welcomed. It's not considered necessary to repeat parts of the plan in multiple places.

POLICY	C2			
All respondents **raising objections** on this policy/chapter	78.2	89.19	134.12	136.5

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
It should be confirmed that out of centre developments will be required to contribute to criterion f) through S106 obligations. Out-of-centre developments should contribute to public realm enhancements in the centre.	There is not considered to be justification for requiring developments in other district centres to make contributions to public realm enhancements in the city centre.	None
The threshold for the % of Class E uses in the frontages will need to be clearly justified. Retention of existing threhsolds that are a snapshot of current trading profile and market circumstance may not facilitate the essential and rapid response to dynamic retail and leisure markets and could impact negatively on the prospects of the centres. The ongoing repurposing of class E floorpsace within the city	The thresholds are not set at current levels, but above them, allowing for some change. However, it is considered important to guide uses in frontages, because the type of activity is important. Ensuring there are commercial uses (use class E) that people want to visit is important to the vitality of the centres. Also, these are the locations these uses are directed to, and they should be in these accessible	None

centre demonstrates oversupply. New build retail floorspace will simply compete for existing tenants. Provision of food and drink (Class E(b)) is at saturation point. Further transitioning away from Use Class E should therefore be allowed. The permission granted for the Clarendon Centre is a manifestation of this essential process of change and renewal. Amend the policy to confirm that the development criteria will be applied flexibly and only where justified by the development proposed. It is considered that wording should be inserted into the emerging policy to reflect that, *unless otherwise agreed with the local planning authority on the basis of site specific circumstances, the provisions set out under the active frontages can be considered flexibly*. This would enable the delivery of successful active frontage through positive masterplanning and place making.	locations, with other facilities and services available to ensure vibrancy and to allow linked trips. Use Class E is very wide ranging, and that in itself allows very significant flexibility. There is no evidence that food and drink is at saturation point, because if it was there is a very wide range of other Use Class E uses it could transition to, including some employment use. Also, as the thresholds are exceeded currently, transition away from Use Class E would not be an issue). There is no need to allow free transition away from Use Class E, and this would have a potentially very negative effect on the centres. Furthermore, the active frontages apply to the ground floor only.	
Oxfordshire County Council has made a representation relating to Policy C2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Any use of thresholds is not realistic for residential mixed-use development such as Templars Square, where the ground floor will also need to serve significant residential development on upper floors. Instead, the approach should be design-led, as well as recognising that residential ground floor	Creating frontages that are 'active' from a place making perspective is one aspect of ensuring successful centres. However, it is not the only important consideration, and the mix of uses is also important. Residential entrances may create some activity, but a successful district centre cannot be made from a high proportion of	None

entrances are active. The priority should be focused on maximising active frontages to create a vibrant place through positive place making and not by prescriptive targets, which may have other unintended design consequences.	residential uses- it must have facilities and services that attract people from outside to use the centre. In the specific case of the Cowley Centre, which is to be significantly redeveloped, the areas of frontage will not remain the same, and the Policy SPS16 is clear about this. There is significant and sufficient flexibility to ensure a large amount of additional residential, whilst still protecting the basic function of the centre as a district centre.	

Policy C3

POLICY	**C3**
All respondents **supporting** policy	30.13

COMMENT SUMMARY	**OFFICER RESPONSE**
Strongly support the emphasis on retaining and where possible improving facilities available for public use (would like more emphasis on these being affordable if possible).	Support is welcomed.

POLICY	**C3**		
All respondents **raising objections** on this policy/chapter	134.8	124.5	85.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The policy seeks to protect small shops that are considered as community assets in the use class order. It should be clearly articulated that this does not apply to city centre sites, or successful redevelopment could be prevented from coming forward, e.g. on the Nuffield sites.	To meet the definition in Use Class F2, a shop needs to be 280sqm or less and at least 1,000 metres from a similar facility. This definition will rarely, if at all, apply in the city centre (or any district centre).	
While it is unclear whether healthcare facilities are included within the Local Plan's definition of community facilities; policies aimed at preventing the loss or change of use of these facilities may have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community. The NHS requires flexibility within its estate.	Most health care facilities are Use Class E or C2 (hospitals). The supporting text to this policy is clear that it relates to Use Class F2. There is enough flexibility in the plan to give flexibility to the NHS in the way its estate is managed. The important matter is that needs continue to be met and key services delivered.	None.
Sport England has made a representation relating to Policy C3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy C4

POLICY	C4
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	C4

All respondents **raising objections** on this policy/chapter	89.2	160.3	85.2	138.38

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The policy and criteria is supported in principle, however academic institutions exclusively for 18+ are excluded from the policy whilst there is no alternative policy allowing objective assessment of the need for new facilities. The caveat should be removed, or a university-specific policy proposed.	Policy C4 is intended to apply to, and is only appropriate to, educational establishments that include students up to 18+. The Policy would not apply well to the universities. The types of development the universities bring are wide ranging, and often on campus sites. They include student accommodation and research and development facilities of various types, not just purely academic facilities that are self-contained. Furthermore, it is the case that the universities have a global reach as seats of learning, not just a local one. They cannot be assessed against criteria including local need and requirement. A very wide range of policies in the plan may apply to university developments, and the nature of each individual proposal will need to be considered against the relevant generic policies or site allocations. University developments often have complex and wide-ranging impacts and also very significant benefits, beyond just the local, which cannot be summed up in one policy. The Oxford Local Plan 2036 does include a policy for health and education (Policy E2), but Policy E2 is generally supportive, says that proposals should show how the wider policies of the Plan	None.

	are met, and links to the student accommodation policy. It was not considered necessary to take this forward into the Oxford Local Plan 2045.	
The City Council has, at every single local plan, attempted to block any rivals to oxford University or other institutions trading on the Oxford moniker. This exception is unjustified as essentially the universities can do whatever they want, without giving access or use to the citizens of Oxford. Remove the unjustified phrase 'the proposal will meet local needs or an existing deficiency in provision or access', a backdoor method of banning new institutions, and the exception that the universities do not have to provide benefit to Oxford.	There is no attempt in the plan to block any rivals to the University of Oxford or other institutions. The policy does not apply to educational establishments for those only 18+, as these do not meet local needs. Therefore, all institutions for those 18+ are on the same footing. There is no reason for all those for students under 18 not to meet criterion b- which refers to local needs, or a deficiency, or supporting regeneration.	None.
Oxfordshire County Council has made a representation in relation to Policy C4, which is summarised and responded to in their Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England has made a representation in relation to Policy C4, which is summarised and responded to in their Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy C5

POLICY	C5	
All respondents **supporting** policy	63.1	159.27

COMMENT SUMMARY	OFFICER RESPONSE
No comment made.	Support is welcomed.
Support that new visitor and cultural attractions within the city permitted if comply with these policy requirements.	Support is welcomed.

POLICY	C5
All respondents **raising objections** on this policy/chapter	134.9

3081

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Enough flexibility is needed. Supporting text should be incorporated that is flexible towards protection and retention of cultural venues where site allocations are supported for comprehensive mixed-use redevelopment, as well as an additional bullet point included in the policy itself as a reason loss would be supported.	The site allocations comply with the plan strategy and detailed policies of the plan- they are not considered reasons for exceptions. That a site is mixed-use and comprehensive redevelopment is expected is not a reason that cultural venues become less important to retain. Mixed-use redevelopment is likely to give many opportunities for reprovision, potentially in a different way.	None.

Policy C6

POLICY	C6
All respondents **supporting** policy	30.14

COMMENT SUMMARY	OFFICER RESPONSE
Overall there should be more emphasis on encouraging the provision of improved cycle lanes especially those solely for walkers/cyclists, and not for vehicular traffic.	Noted. Policy C6 requires Transport Assessments to prioritise pedestrian and cycle movements, both within the scheme and within neighbouring areas.

POLICY	C6			
All respondents **raising objections** on this policy/chapter	12.3	59.1	89.21	138.39

3082

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The NPPF (para 161) requires that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions….and support renewable and low carbon energy and associated infrastructure". As written, the policy does not adequately recognise the importance of transport emissions to the radical reductions required by the NPPF, the national targets in the Climate Change Act and the City's own targets. These	The spatial strategy in policy S1 addresses the reduction of transport emissions, and is not considered necessary to repeat in this policy.	None.

will require almost complete elimination of direct use of fossil fuels in transport within the city on the timescales of the plan.		
Policy should be made more robust - - at the end of the first sentence add 'as soon as possible as the development proceeds and measures have been taken to ensure the need to travel by car is minimised' - references to pedestrian and cycle movements and public transport should be higher up the list of factors to be considered - they should be a) and b) not c) and d) - in existing d) after 'access to high quality public transport is facilitated 'add 'and, where appropriate, funded for a specified period'	This list is not hierarchical and all factors should be considered.	None.
Oxfordshire County Council has made a representation relating to Policy C6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
A typical bureaucratic view of the world, plan=delivered. b) "…residual .. impact" means what? N.B. no specific change so put all in general section c) "and within neighbouring areas" is ineffective as it is outside of the developer's control. Ineffective, as none of above actually reduces anything and implies an increase in traffic is acceptable which it is not as roads are already 100% bandwidth utilised.	Policy C6 seeks to ensure that any traffic impacts from development proposals are appropriately addressed and mitigated where appropriate. The policy has been drafted to align with the wording in NPPF. The draft policy does not make any direct reference to the AQMA. The whole of the city was declared an AQMA in 2010 so the comment about the City Centre is not considered to be appropriate.	None.

Ineffective as it muddles planning with delivery of the objectives, the policy must state this must be done, not planned for. Ineffective as it states “is likely to” which is meaningless, and only applies to the City Centre AQMA not the whole city. Ineffective as no metrics given.		

Policy C7

POLICY	C7
All respondents **supporting** policy	159.28

COMMENT SUMMARY	OFFICER RESPONSE
Cycle parking provision is imperative, including parking for E-Bikes and associated charging. The policy allows for lower parking standards where this is justified. This is important as cycle parking standards can result in excessive provision, leading to inefficient use of land, a proliferation of unsightly cycle stands and adverse impact on heritage assets, particularly in the City Centre. The policy sets out a sensible and pragmatic approach to deal with the issue.	General comments and support noted.

POLICY	C7

All respondents **raising objections** on this policy/chapter	89.22

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxfordshire County Council has made a representation relating to Policy C7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy C8

POLICY	C8
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	C8				
All respondents **raising objections** on this policy/chapter	43.11 / 43.10	47.15	59.11	78.3	89.23
	138.4				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not justified or effective, also not legally compliant - Policy overly restricts car parking in new developments, which would have negative impacts on car access for certain groups not allowed for in the policy- e.g. older people, or families with young children. Policy also too prescriptive in its criteria, which does not account for differences in transport access requirements from the development - e.g. in relation to the routing of bus services, the variable conditions such as weather on active travel routes to shops and the use of car clubs. Restricting car parking could impact development viability and have detrimental impacts elsewhere- e.g. overflow parking and impact on house prices. Policy can be made sound by deleting the first two paragraphs under *"Residential Developments".*	The Plan aims to promote and achieve a shift towards more sustainable modes of travel. Policy C8 helps to achieve this aim and is not considered unnecessarily prescriptive. The standards align with Oxfordshire County Council's Parking Standards for New Developments. The viability impacts of low car policies have been tested and explored in the Viability Assessment for the Plan, separately and cumulatively with the other policy requirements of the Plan, to ensure that developments are not made unviable. It is not considered appropriate to remove the first two paragraphs under *"Residential Developments".*	None

Unsound as not effective, and not consistent with national policy, also not legally compliant - Policy is inflexible and not inclusive when considered against the NPPF particularly in relation to balanced sustainable development, parking standards and realistic transport choices - given its impact on those who may need access to a car - e.g. tradespeople, older people, families with children, carers. Policy is not flexible enough to account for differences in local circumstances, e.g. car ownership patterns, needs of specific groups or other circumstances where a site specific assessment may be needed to assess car parking need. Not legally compliant – unclear whether the policy can successfully manage network impacts – e.g. if the low car approach proves undeliverable, leading to displaced on street parking and enforcement problems. Policy can be made sound if it is refined to introduce explicit scope for site specific justification of limited additional parking where necessary to address accessibility needs or demonstrable risks of displacement, and better articulate how CPZ roll out, enforcement and wider transport improvements will be coordinated with the phasing of low car developments.	Comments noted and suggested amendments are not considered necessary. The County Council is ultimately responsible for the introduction/ delivery of controlled parking zones. Enforcement is beyond the scope of the Local Plan.	None
Unsound as not justified - Policy should also refer to the provision and maintenance of car	Policy encourages and allows for car clubs. These operate independently and therefore their provision or	None

clubs, should encourage low traffic neighbourhoods and car-free developments (as well as low car developments). The council should be proactive and identify sites for car-free development.	maintenance cannot be controlled. Low traffic neighbourhoods are beyond the remit of the local plan.	
Unsound as not positively prepared, justified or effective - To be consistent with the objective to sustain and enhance the vitality and viability of town centres, no dedicated parking should be allowed for out-of-centre developments, as this would give them a comparative advantage, accentuated by freedom from the congestion charge, and it will be considered to be in conflict with Policy C8 if the transport assessment indicates that dedicated parking would be necessary to make the transport impacts of the proposed development acceptable.	Criteria a-c of Policy C1 are intended to ensure that the accessibility of any out-of-centre location (if it can be justified through the sequential test and is in accordance with other policies) is considered, and that impacts on the road network are mitigated. Policy C8 works with this and, for all non-residential development, has a starting point of no additional parking except for blue badge and servicing. Any additional parking must not only be justified and minimised, but also demonstrated to have no unacceptable impacts on the transport network. It must be justified in the context of the objective of the Plan to promote a shift towards sustainable travel.	None
Oxfordshire County Council has made a representation in relation to Policy C8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Unsound as not effective - “scheme” ("will only be granted for residential schemes* that are low car") and “frequency” are not defined. “Seek a reduction” is ineffective. Essentially policy permits an increase in traffic if the developer can prove it is necessary via its transport assessment. As extra staff or residents will be multimodal, at least some will increase traffic, therefore a net reduction is required to compensate.	The word ‘scheme’ is used in the policy in the context of landscaping. There is no reference within the policy to "will only be granted for residential schemes* that are low car", the reference is *"will only be granted for residential developments that are low car"*. The word frequency is used in the definition of criteria for low car residential developments where it is stated *“.....Where the site is located within a 400m walk to frequent (at least 2 an hour) public transport services”.* The policy wording states *“In the case of all non-residential developments, the starting point is for no*	None

	additional parking except for blue badge and servicing only. The Council will seek a reduction for highly accessible sites". No changes are considered necessary.	

Chapter 8

General comments relating to Chapter 8

POLICY	General comments
All respondents **supporting** policy	No general comments made in support of chapter.

POLICY	General comments			
All respondents **raising objections** on this policy/chapter	78.8	101.5	104.1	115.2
	128.4	140.9	88.8	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
A significant number of the site allocations that are made in the Plan include provision for town centre uses. None of the allocations that include town centre uses specify the floorspace quanta for those uses that it is anticipated will be delivered on the respective sites. Moreover, there is no evidence that the potential impacts, including cumulative impacts, on the city centre and other designated centres, have been assessed, nor has the sequential approach been applied. The current evidence is that there is an over-provision of floorspace in town centre uses within the city, as reflected in current initiatives to reduce it through, for example, the	The site allocation policies set out what type of land use or mix of uses is considered to be suitable on a particular site in accordance with national policy and the local plan's own requirements. It takes into account landowner intentions, deliverability and other physical or policy constraints. The emphasis is on the delivery of housing where this can come forward and where there is scope for potential complementary uses these are highlighted. Town centre uses are legally permissible development and the local plan contains appropriate location policies. There is no reason to add further policy constraints or restrictions on their provision on top what is driven by market forces.	None

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
repurposing of the Clarendon Centre. The process of adjusting to the recent events that are acknowledged in the 2023 needs study and cited above is ongoing. The even more recent events that post-date both the 2023 and 2025 needs studies pose further shocks and threats to the already precarious and volatile market circumstances. The planning policy provisions should therefore respond accordingly with a precautionary approach unless and until there is clear evidence of a positive long term outlook.	Evidence is that there is significant need or demand for town centre commercial uses within Use Class E. The Clarendon shopping centre is within Use Class E and even if there are fewer shops coming forward, the majority of the site will still most likely come forward within the lawful use (Use Class E) for commercial uses that are still town centre uses.	
Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are on and off site, what loading/flow from the site is anticipated and water supply requirements on and off site. It can take 18mths-3 yeras for local upgrades and 3-5+ years for more strategic solutions. Thames Water offers a pre-planning services for developers to engage and understand what if any upgrades will be needed.	Following on from feedback at Reg 18 stage, we have incorporated wording into the supporting text of Policy R5 that encourages applicants to engage with Thames Water at the earliest opportunity to establish the requirements for water supply and sewage/wastewater treatment network infrastructure both on and off site and ensure that these are planned for in due course. In terms of drainage requirements, the SuDS policy G8 sets out various requirements which seek to ensure an appropriate drainage strategy is pursued.	None
The draft Plan proposes to co-ordinate development with the delivery of social, community and transport infrastructure across four 'Infrastructure Area' quadrants, within which there are 'Areas of Focus' – areas where changes are anticipated over the plan period resulting from new development at existing and	While there is continued engagement and coordination with adjoining authorities, the local plan is required to address policies, designations and allocations that are within the administrative boundary of Oxford.	None.

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
proposed allocated sites - including development sites outside the city adjacent to the city's boundaries. The plan states that these are where a wider area consideration [through discussions and co-ordination with neighbouring authorities] will be needed to ensure success. [It is considered] that the draft Plan has failed to include similar opportunities that are evident within the East Infrastructure Area at Headington to build on the growth and regeneration benefits arising from development at Barton Park and strategic allocation at Land North of Bayswater Brook (STRAT13). At Headington, there is further growth potential such as through a sustainable extension to Land North of Bayswater Brook to support growth, regeneration and infrastructure delivery.		
The BOB ICB (now NHS Thames Valley) made general comments on the deliverability on a number of sites in relation to flood risk. Detailed comments were made on individual sites, as well as the supporting evidence base.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency made general comments on the deliverability on a number of sites in relation to flood risk. Detailed comments were made on individual sites, as well as the supporting evidence base.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Network Rail has made a representations relating to an Omission Policy, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy I1 Digital Infrastructure to support new development

POLICY	I1
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	I1
All respondents **raising objections** on this policy/chapter	78.4

3093

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
This policy is too narrowly focused on broadband and data centres associated with new developments. The policy framework in the Plan should be broadened to provide support for the full range of contemporary digital infrastructure requirements, including digital screens associated with existing developments, which are essential to sustaining the vitality of contemporary city centres and ensuring inclusivity and equality. As evidenced through recent planning applications in the city centre, there is pressure for the installation of such technology, many in	The policy already includes requirements for minimising the visual and amenity impacts of digital infrastructure. In combination with other policies of the plan, there are sufficient instruments to ensure that installations are not sited in inappropriate locations or have unacceptable impacts.	None required.

inappropriate locations, which is likely to escalate. A policy approach, with identification of opportunities in key locations for the installation of digital screens working collaboratively with key city centre stakeholders, such as WOA, will ensure that such pressures are managed and this essential infrastructure can be delivered in an appropriate and coordinated manner to support the needs of existing investors and key stakeholders.		

Policy I2 Safeguarding Land for Infrastructure

POLICY	**I2**		
All respondents **supporting** policy	89.24	104.17	135.1

3094

COMMENT SUMMARY	**OFFICER RESPONSE**
Support for this policy	Comment noted.
The East West Rail Company has made comments in support of Policy I2, which is summarised and responded to in the Statement of Common Ground.	The City Council welcomes the support of the East West Rail Company in relation to Policy I2, which includes the requirements of the most recent (November 2025) Safeguarding Direction.
The Environment Agency has made a representation in support of Policy I2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	**I2**		
All respondents **raising objections** on this policy/chapter	88.4	88.6	132.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The East West Rail Company has made a representation relating to Policy I2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
...In planning for the area the Council should: • Safeguard all existing NGET transmission assets, including overhead lines, underground cables and substations. • Support future reinforcement and expansion, including works required for the Great Grid Upgrade and other strategic national infrastructure projects. • Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion. • Safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations. • Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.	The policy has been developed to safeguard land for specific schemes that have progressed to an advanced stage of consent regimes that are outside of the planning process. These are specified in the policy text as the East West Rail (Oxford) and Oxford Flood Alleviation Scheme (OFAS). It is not the intention for I2 to serve as a general safeguarding policy for existing or routinely delivered infrastructure assets, or to safeguard infrastructure schemes that can be delivered through the local authority planning process.	None required.

• Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.		
Network Rail has made a representations relating to Policy I2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy NEOAOF: Northern Edge of Oxford Area of Focus

POLICY	NEOAOF	
All respondents **supporting** policy	157.22	157.14

COMMENT SUMMARY	OFFICER RESPONSE
Support the policy approach / the NEOAOF policy	Support is welcomed
Support the proposal to identify “infrastructure areas” and ‘Areas of Focus’, in particular the North Area and Northern Edge of Oxford Area of Focus, which includes the Oxford North/wider Northern Gateway development. This Area of Focus has huge potential to help deliver the housing and economic needs of Oxford, in particular at Oxford North. This was identified in the Oxford Growth Commission’s Interim Report. Oxford North is at the heart of the corridors identified and ideally situated to maximise the economic and social returns sought from further investment. Support that higher density development and exemplary buildings can be accommodated in the area of focus to celebrate the area as a gateway and area of innovation. The first phase of buildings at Oxford North, including the Red Hall and workspace buildings along with the central landscaped park have certainly taken this to heart.	Support is welcomed

It is important, as recognised in the supporting text that Oxford City closely aligns with Cherwell District Council to ensure the delivery of key active travel routes through the various allocations in each authority area.	
We support the acknowledgement that this area is adjacent to other urban extension sites in Cherwell District Council. We urge that the Council works proactively to ensure that there is a joined-up approach with neighbouring authorities, particularly in the provision of wider infrastructure.	Support is welcomed.

POLICY	**NEOAOF**				
All respondents **raising objections** on this policy/chapter	81.8	85.7	92.5	115.3	139.15

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
Historic England has made a representation relating to Policy NEOAOF, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sports England has made a representation relating to Policy NEOAOF, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Cherwell District Council has made a representation relating to Policy NEOAOF, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (now referred to as NHS Thames Valley) has made a representation relating to Policy NEOAOF,	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

which is summarised and responded to in the Statement of Common Ground.		
Reference should also be made here to the close proximity of the Green Belt to this AOF and the important role it plays in providing a green gap between North Oxford and Kidlington. It should be acknowledged the Green Belt needs to be protected, to ensure that the gap is not further eroded.	Any erosion of the remaining gap would be due to development outside the Local Plan area, and therefore it would not be appropriate for the Oxford Local plan to reference the need to protect the gap north of Oxford's boundary.	None.

Policy SPN1: Diamond Place and Ewert House

POLICY	SPN1
All respondents **supporting** policy	No representations in support of the policy.

POLICY	SPN1	
All respondents **raising objections** on this policy/chapter	105.13	115.4

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Delete from the policy wording: "minimum number of dwellings to be delivered is 135" and replace with: "The development is expected to deliver around 100 dwellings on Diamond Place and 80 dwellings on Ewert House".	The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is suitable for the setting. The policy wording is clear that it is a minimum requirement, therefore there is opportunity to deliver a higher number if it meets the requirements of	None

	all relevant policies in the Plan. Not splitting the requirements over the two parcels also provides more flexibility in how it can be delivered.	
The Integrated Care Board (now NHS Thames Valley) has made a representation relating to Policy SPN1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPN2: Elsfield Hall, Elsfield Way

No representations received against this policy.

Policy SPN3: Oxford North Remaining Phases

POLICY	SPN3
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPN3			
All respondents **raising objections** on this policy/chapter	47.16	81.9	90.6	157.15

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy SPN3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Natural England has made a representation relating to Policy SPN3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
SPN3 moves away from the vision set in the NGAAP. The priority for Northern Gateway has always been employment first and foremost. Going back to the Core Strategy the site was allocated as a strategic location to provide "modern employment led development with supporting infrastructure and complementary amenities" (Policy CS6 of the Oxford Core Strategy). Furthermore, the NGAAP Inspector assessed the mix of uses at the site and states that the housing component (500 dwellings) "would remain a complementary use to the employment led development" (paragraph 43 of the Inspector's report on the NGAAP). The report goes on to consider if exceptional circumstances existed to remove the land from the Green Belt. The Inspector concluded that the need to provide employment led development which was critical to the knowledge spine amounted to exceptional circumstances to justify the release from the Green Belt. SPN3 goes against this by saying that the "priority use of this site is to deliver the remaining residential commitment from the	Oxford has a well-known urgent need for more housing and demand continues to outstrip supply. This has many impacts on the city and its residents. The supply of available and affordable housing, is therefore a priority of LP2045. The wider Northern Gateway area within which this site is located, is one of the largest areas for residential and specialised employment growth in Oxford, and a rare opportunity for strategic scale growth. SPN3 references that parts of the Oxford North development have already been delivered in recent years, or are under construction, with reserved matters applications to follow for the remaining phases. SPN3 sets out that a mix of uses is appropriate on the remaining phases, and leaves flexibility on the distribution of those across the plots, but it is essential that the commitment to deliver at least 161 more homes (in addition to the 319 homes already delivered at Canalside, to bring the total to 480 homes as per the outline permission,) is borne out, as part of the remaining phases, because of the huge need for more homes in Oxford. Whilst the NGAAP identified the areas for	None

hybrid Oxford North Permission". LP45 also splits up the remaining areas of the NGAAP Spatial Strategy [see NGAAP diagram in reps]. Delete the text in the policy as below: "…[Given the shortage of housing in the City a The priority use for this site is to deliver the remaining residential commitment from the hybrid Oxford North permission.]"	employment-led development, it was always set out as a mixed use development with the opportunity to deliver a strategic scale of homes (500 homes) alongside employment growth to support the knowledge economy.	
Recreational and traffic pressures from additional housing and employment may increase visitor use of nearby meadows (including dog walking) and add to air quality burdens on sensitive habitats, but SPN3 does not explicitly address recreational pressure on the Oxford Meadows SAC or set out specific mitigation (e.g. on site alternative natural greenspace, dog walking routes, or access management). Policy should strengthen Environmental and SAC/SSSI Safeguards. Require that any further residential or employment development under SPN3 demonstrate, via Habitats Regulations Assessment, that there will be no adverse effect on the integrity of Oxford Meadows SAC and nearby SSSIs, taking account of recreational pressure and traffic related air quality. Require provision of high quality on site green space and walking routes (including dog walking areas) designed to absorb recreational use and	Policy SPN3 has been assessed as part of the Habitat Regulations Assessment (stage 2: appropriate assessment). It has been considered in relation to all the conservation objectives at the site. Criterion b) of policy SPN3 sets out a requirement for an increased level of public open space for the residential component of development at the site (15% as opposed to the standard 10% open space provision). This has been agreed with Natural England as part of the stage 2 appropriate assessment contained within the Habitat Regulations Assessment (HRA). The HRA also includes an air quality assessment (which considers all development in the plan, including Policy SPN3). Natural England has also agreed that there will be no likely significant effects at the Oxford Meadows SAC in relation to air quality. While the Northen Edge of Oxford Area of Focus policy does highlight the proximity of the	Update criteria b) of Policy SPN3 to make it clear that this requirement has been included in Policy SPN3 to ensure that there will be no adverse effects on the integrity of the Oxford Meadows SAC. Amend criterion b) as follows: *b) Planning permission will only be granted for developments that provide usable, well designed and good-quality publicly accessible green open space. At least 15% of the total site area must be provided as green public open space; this must be distributed so that at least 15% of any parcel proposed for residential development is green public open space. This is to ensure that there will be no adverse effects on the integrity of the Oxford Meadows SAC.*

thereby reduce pressure on designated meadows.	SAC, we acknowledge however, that policy itself may benefit from some sign-posting to highlight that criterion b) has been specifically included in Policy SPN3 to ensure no adverse effects on the integrity of the Oxford Meadows SAC. *b) Planning permission will only be granted for developments that provide usable, well designed and good-quality publicly accessible green open space. At least 15% of the total site area must be provided as green public open space; this must be distributed so that at least 15% of any parcel proposed for residential development is green public open space. This is to ensure that there will be no adverse effects on the integrity of the Oxford Meadows SAC.* A Source Pathway Receptor Analysis (SPRA) has been carried out which considers the impacts of the development proposed in the plan on the city's network of Sites of Special Scientific Interest (SSSIs). For Policy SPN3, criterion a) sets out the requirements regarding the Wolvercote Meadow and Pixey Yarnton Meads SSSI,	
The cumulative hard surfacing and ground re profiling across all Oxford North phases may affect local hydrology, including pathways that influence groundwater fed meadows in the SAC/SSSIs. SPN3 does not clearly set out how cross phase drainage, infiltration and groundwater management will be handled to	The SFRA does not highlight any particularly high flood risk concerns for this site, neither has the EA raised any site-specific concerns for this site. So these issues would be covered by the general Policy G7 Flood Risk and Flood Risk Assessments.	None

avoid unintended impacts downstream. Given increasing extreme rainfall, there is a need for robust assurance that development will remain safe over its lifetime without increasing flood risk elsewhere and that SuDS and buffers will be sufficient in practice, not just in principle. To be fully justified and effective, SPN3 should explicitly tie remaining phases into a comprehensive site wide flood risk and drainage framework for Oxford North, demonstrating long term climate resilience and no adverse effects on sensitive hydrological receptors, in line with NPPF guidance on flood risk. Clarify Flood Risk and Drainage Strategy Tie SPN3 explicitly to a site wide FRA and drainage strategy for all Oxford North phases, demonstrating long term climate resilience and no increase in downstream flood risk, especially in relation to groundwater dependent habitats.		
Affordable Housing and Viability: The Plan's general affordable housing policy expects up to 50% affordable housing on qualifying sites, subject to viability, with tenure mixes set out in Policy H2. For a strategic site such as Oxford North, local communities reasonably expect a substantial affordable housing contribution. However: • Stakeholders including Wolvercote and Summertown & St Margaret's Neighbourhood Forums have raised concerns that viability	Policy H2 requires 40% affordable housing provision, unless the site is in the Green Belt – those sites are required to provide 50%. This level of provision has been informed by a Viability Assessment for LP2045. SPN3 does not need to reiterate affordable housing requirements because it is covered in general Policy H2 Delivering Affordable Homes. Reserved matters applications for the latter phases will be assessed against the adopted	None

assessments for later phases may lean heavily on developer profit assumptions (e.g. around 16.5%) and conservative land value benchmarks to justify reductions below policy compliant affordable housing levels. • SPN3 itself does not restate affordable housing expectations or require any specific viability review mechanism; nor does it require transparency or independent scrutiny of viability evidence at reserved matters or later phases. Guarantee and Monitor Affordable Housing Delivery Re state that later phases are expected to deliver up to 50% affordable housing in line with Policy H2, subject only to independently reviewed viability evidence. Require that viability assessments be made publicly available (subject to legitimate confidentiality) and include review mechanism clauses so that uplift in values can trigger additional affordable housing or contributions.	planning framework at that time – whether that is still LP2036 (which has the 50% requirement) or LP2045 when that is adopted (with 40% requirement). If a developer is claiming that policy requirements for affordable housing are not viable, then any negotiations will always be on an 'open book' basis and will be informed by assessment from an independent assessor. These requirements are set out in Policy S4 Plan Viability.	
The Northern Edge of Oxford Area of Focus highlights that Oxford North and adjacent sites will significantly increase demand on the A34, A40 and A44 corridors, and emphasises the need for improved walking, cycling, wheeling and public transport connections, including to Oxford Parkway and Cherwell's PR6 allocations. It also identifies the need for contributions to	General Policy S3 Infrastructure Delivery in New Development references the Infrastructure Development Plan (IDP), so this does not need to be repeated in every individual site allocation policy. is a living document that sits alongside the LP2045	None

primary school expansion and other social infrastructure. Despite this, concerns remain that: • Existing congestion and air quality issues on the A34/A40/A44 corridors could be exacerbated by cumulative development (Oxford North, Cherwell PR6 sites and Pear Tree Farm), especially if modal shift targets are not achieved. • SPN3 does not clearly specify what transport mitigations, active travel links and public transport enhancements are required from the remaining phases, or how these relate to the Infrastructure Delivery Plan and the Area of Focus requirements. • The capacity and funding of schools, healthcare and policing to absorb additional population are not spelled out within SPN3, leaving uncertainty about how essential services will keep pace with growth. Policy needs to: - Cross reference the Infrastructure Delivery Plan and Northern Edge of Oxford AoF to specify key infrastructure to be funded from remaining phases, including school capacity, health provision, active travel links and public transport enhancements to Oxford city centre and Oxford Parkway. - Require transport assessments for each major phase to assess cumulative impacts on A34/A40/A44 and local junctions and to secure	Transport Assessments are addressed in general Policy C6 Transport Assessments, Travel Plans and Service and Delivery Plans, and would include multi-modal assessments.	

proportionate mitigation and mode shift measures.		
Improve Design Guidance and Community Involvement: Link SPN3 more explicitly to the High Buildings TAN and any site specific design codes, including indicative height/massing ranges and design principles for edges adjoining Wolvercote Conservation Area and nearby neighbourhoods; Encourage structured community engagement (including with neighbourhood forums) on major buildings and public spaces to ensure that future phases better reflect local character and aspirations; Acknowledge in the supporting text that the Oxford North allocation will be kept under review as the Local Plan is updated to address previous Inspectorate findings on housing need and the Duty to Cooperate, ensuring that SPN3 remains consistent with a sound strategic framework.	Policy SNP3 sets out site-specific design requirements, and general Policy HD1 sets out general principles for high quality design. The Wolvercote Conservation Area is also specifically referenced in SPN3 that proposals must take into account. The Statement of Community Involvement encourages early consultation with the local community for major developments, and this is also highlighted in Appendix 1.1 Design Checklist of LP2045. Dialogue with adjoining authorities is ongoing, and the LP2045 has been prepared fulfilling the Duty to Cooperate (since March 2026, replaced by a requirement to demonstrate collaboration).	None

Policy SPN4: Oxford University Press Sports Ground, Jordan Hill

POLICY	**SPN4**
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**SPN4**				
All respondents **raising objections** on this policy/chapter	36.2	105.14	126.1	85.8	138.41

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The redevelopment would result in the loss of an established cricket facility that is actively used. The plan indicates that development could proceed with a higher number of homes if the pitch is not retained, yet there is no clear evidence this facility is surplus, nor an identified replacement option. Therefore the allocation is not justified and it is inconsistent with national policy, which seeks to protect facilities unless they are demonstrably surplus or replaced with better provision.	The allocation is very clear that the sports facilities are not considered surplus. Therefore, they would need to be retained or replaced. As there is no identified option currently for replacement, the minimum housing figure assumes retention of the cricket pitch on the site. It is only if a replacement option is found that a higher number of homes would be expected than the minimum number stated in the policy (which assumes retention of the cricket pitch).	None
The potential loss of these facilities would represent a disproportionate reduction in cricket provision within Oxford, removing a significant proportion of the infrastructure that supports youth development, women's cricket and inclusive participation. There is no clear evidence that replacement cricket facilities of equivalent quality and accessibility could be delivered within the city to offset the potential loss. Any replacement must also be delivered prior to the loss of existing facilities.	Because there is no clear replacement at the current time, the policy assumes retention of the cricket pitch on site. The site is of considerable size and capable of accommodating new development as well as retaining the cricket use. However, it is possible that a replacement will be found, which would enable development of a larger part of the site.	None
In the policy, replace "minimum number of homes to be delivered is" with "development is expected to deliver around…".	The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is	None

	suitable for the setting. The policy wording is clear that it is a minimum requirement.	
This site should not be allocated because there is a lack of green space and it is in proximity to the river.	The site is not in close proximity to a river. The site is not publicly accessible open space, but the sports facilities are in use by clubs and important to retain, either within the site, or with reprovision. The policy approach assumes retention within a smaller part of the site, alongside new development.	None
Sport England has made a representation relating to Policy SPN4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPN5: Pear Tree Farm

POLICY	**SPN5**
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**SPN5**			
All respondents **raising objections** on this policy/chapter	81.1	88.5	123.2	135.2

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**

Historic England has made a representation relating to Policy SPN5, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Network Rail has made a representation relating to Policy SPN5, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
East West Rail has made a representation relating to Policy SPN5, which sought to clarify infrastructure delivery responsibilities. This is summarised and responded to in the Statement of Common Ground.	The Statement of Common Ground with the East West Rail Company (EWR Co) clarifies the position in relation to the EWR Co regarding infrastructure delivery.	None.
Site allocation states suitable for "other complementary uses" to residential-led development; this should be expanded to state "employment uses" alongside residential as part of the allocation to enable a cohesive cross-border development to come forward. Amend wording to: ...the addition of commercial accommodation would deliver co-location benefits, including: • Creation of sustainable communities where people can live and work locally; • Supporting co-location of flexible workspace and housing, ideal for start-ups, spin-outs and entrepreneurs; and • Encouraging active travel and public-transport use through the highly sustainable location of the site, a short distance from Oxford Parkway.	The priority use for this site is for residential development, to help contribute to meeting the city's housing needs, and as part of the vision for the wider Northern Gateway area. Therefore the site allocation policy seeks residential-led development, with complimentary uses to be considered on their merits. The Plan's strategy is to deliver any employment development through modernisation and intensification of existing employment sites, without allocating any additional new sites for employment.	None

Policy SPN6: Red Barn Farm

POLICY	SPN6
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPN6
All respondents **raising objections** on this policy/chapter	123.3

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
We note that the allocation continues to refer to the site as being occupied by a charity. However, we can confirm that the charity has now completed the purchase of a new site in the locality to which it will relocate to. Its lease at Red Barn Farm is due to expire on 28 June 2026 and will not be renewed. The reference to re-provision within the allocation effectively duplicates requirements	It is noted that a new site is being progressed by the landowner. Once construction of the new facility is completed and it is operational for the users, that is normally the point at which it could be assessed to confirm the reprovision requirement has been met, and if applicable amend the policy accordingly.	None

already addressed through Policy C3. Retaining this wording would therefore result in a double count for the charity's relocation, as the matter is already appropriately covered by Policy C3. The wording within the allocation requiring the reprovision of the charity's facilities should be removed, as it will no longer be relevant to a vacant site.		

Policy CBLAOF: Cowley Branch Line Area of Focus

POLICY	CBLAOF				
All respondents **supporting** policy	30.15	86.9	88.13	129.3	130.1

COMMENT SUMMARY	OFFICER RESPONSE
Support, no comments received.	N/A
Support identification of South Oxford as part of CBLAOF. Significant regeneration opportunities, potential for high-density development, and public transport improvements. Focus on improving public transport is welcomed.	Support is welcomed.
Network Rail have made a representation relating to Policy CBLAOF, and this is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Support the AOF's placemaking objectives for active travel, quality design and environmental improvements. Support requirement for contributions from identified sites.	Support is welcomed.
Support identification of South Oxford as part of CBLAOF. Significant regeneration opportunities, potential for high-density development, and public transport improvements. Focus on improving public transport is welcomed.	Support is welcomed.

POLICY	CBLAOF

All respondents **raising objections** on this policy/chapter	51.4	81.11	107.6	115.5	85.9
	159.13	89.XX			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
BMW Mini Plant support policy in principle but has concerns regarding contributions for locations within 1500m buffer, given that employees are highly unlikely to use or rely on CBL for transport. This should only be necessary where there is a direct link between the development and use of the CBL for accessing employment. Unclear whether the contributions to CBL would be additional to those derived from CIL and what constitutes "trip-generating development" we assume the reference to figures 8.5 and 8.6 refer to the Oxford Local Plan 2040 Submission Draft as these are not available in the current Submission Draft.	There is an expectation that development sites which are within the buffer zone, and generate additional trips, should contribute to the Cowley Branch Line, however, the specifics of this will need to be determined at application stage when considering the merits of each individual case. Figures 8.5 and 8.6 have been omitted in error and will be reinstated.	Mod proposed to insert figures to show the 1500m buffer zone diagram.
Historic England (HE) have made representations on Policy CBLAOF, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
General agreement with the policy, but the exclusion of the Oxford Stadium from the AOF is a major oversight; a prime location for high-quality residential development.	The Oxford Stadium is included within the CBL AOF. It is not an allocated site because since May 2022 (and after the site was previously allocated in the Local Plan 2036) the site is operating as a greyhound/racing/speedway	None.

Policy SP51 from OLP2036 should be carried forward as a site allocation and amended to reflect important role of Stadium in this AOF. The Sandy Lane West station is a short walk from the stadium, further highlighting potential. Should the uses within the Oxford Stadium Conservation Area cease or relocate, the significance of the heritage asset would reduce; once the Stadium is redeveloped, the Conservation Area designation should be removed. Once the CBL and public transport improvements are delivered, no further financial contributions should be sought.	stadium so community uses would need to cease operations if the site were to be redeveloped.	
BOBICB (now NHS Thames Valley) have made representations on Policy CBLAOF, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England have made representations on Policy CBLAOF, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The policy should include wording to confirm presumption in favour of development for a range of uses including employment and residential to maximise growth potential.	This policy presumes that development would be proposed for both employment and residential uses. Reference is made to the anticipated intensification of existing employment use and the delivery of new residential development.	None.
Oxfordshire County Council has made representations on Policy CBLAOF, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS1: 474 Cowley Road

POLICY	SPS1
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPS1
All respondents **raising objections** on this policy/chapter	104.3

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The Environment Agency has made representations against Policy SPS1, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS2: ARC Oxford

POLICY	SPS2
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPS2			
All respondents **raising objections** on this policy/chapter	57.13	81.12	86.1	138.42

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Errors in site description. No mention of car dealership, hotel, gym and kindergarten on site. Some of this site has been built out, there are still vacant plots which have remained so since the 1990's when the old Rover factory was demolished. The rate of new build has slowed down completely. The vacant plots are very much as they were in 2016 when the previous Policy SP10 was written. As it is proving so difficult to develop this site, the requirement to contribute to the cost of a bridge over the proposed railway nearby will discourage developers from building on the remaining vacant plots. This seems at odds with the policies in the draft Plan encouraging development of Brownfield sites. The Council provides no explanation why so much of this site has been vacant for so long. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.	The description of the site highlights the primary uses of the site. While it is acknowledged that there are some additional complementary uses, including a car dealership, hotel, and gym. The absence of these complementary uses in the policy box does not make it unsound. All remaining plots now either benefit from planning permission (plot 2000) or are the subject of a current planning application (plots 3000, 8200, 8400 and 9200). Given that these remaining plots are all now moving forward, as well as recent applications to modernise and intensify the employment uses at the site (e.g., Plot 2700, Plot 5500, Plot 4200) as well as the recently completed Trinity House scheme, all of which are aligned with the plan's employment strategy and approach of encouraging development of this large brownfield site. Setting business rates is outside the jurisdiction of the Local Plan 2045. See response to policy E1 for further details.	No change proposed

There is an estimated 5ha of vacant land which could be used for homes. Policy E1 must be less restrictive to assist this.		
Historic England has made a representation relating to Policy SPS2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Site is in multiple ownership. Uncertainty about whether the delivery of a comprehensive masterplan covering the whole site will be forthcoming. Also, uncertainty about the status of any such masterplan. At the time, there is no overall strategy which exists for ARC Oxford, therefore, a modification to paragraph b) of the policy is proposed to clarify alignment with an overall strategy should be made 'where one exists.' Paragraph b) of Policy SPS2 should therefore be amended as follows: *b) A site-wide landscaping and public realm strategy for the site is encouraged and proposals for individual plots should then identify how they will align with/ comply with the overall strategy <u>where one exists</u>. Site-specific landscaping schemes should be prepared in accordance with Policies G2, G3, G4 and G5.*	We don't consider the additional text is required in paragraph b) of the policy. Paragraph b) already encourages a site-wide landscaping and public realm strategy to be produced, and then for individual plots to identify how they will comply with it.	No change proposed.

No building on green infrastructure as marked on map, contributions to make it useable by the community from Cowley in particular.	The GI network protections are covered in Policy G1. Development proposals need to accord with these. Contributions sought from developments are often required to mitigate a number of planning-related issues.	No change proposed.

Policy SPS3: Bertie Place Recreation Ground

POLICY	SPS3
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPS3					
All respondents **raising objections** on this policy/chapter	47.17	57.14	65.3	85.18	138.43	139.16

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
SPS3 requires "adequate re provision of the current recreation facilities to meet the needs of those who currently use the facilities and the new residents", stating that the playground must be re provided on site and that replacement of the MUGA may be on or off site provided it still serves teenagers in the neighbourhood. This focuses on like for like facility types but does not address the quantitative and qualitative loss of general open grassed space that currently supports informal play, casual sport, dog walking and social interaction across all age groups.	In addition to the allocation policy requirements, proposals will be assessed against other relevant policies in the plan. Policy G1 has as one of its requirements for applications affecting supporting spaces the provision of evidence that consideration has been taken of the role of existing spaces that support socialization and informal recreation, and where relevant references to up-to-date GI studies with particular attention to local need.	None

The proposed layout significantly reduces the extent of accessible, flexible green space, concentrating provision into a formal MUGA and relatively small play area. This risks undermining wider Plan objectives on promoting health, wellbeing and inclusive, flexible recreation, which rely not only on play equipment but on larger, adaptable open spaces.	This description appears to refer to a planning application on the site that is as yet undetermined. The site allocation policy does not specify a layout or prescriptive design choices. Representations on the detail of live applications can be submitted for consideration through the consultation process for planning applications.	None
The site sits within a constrained street network and Flood Zone 3b; access/egress is already sensitive in flood events, and the policy highlights the importance of safe evacuation and careful surface water management.	The policy includes a requirement for a site specific flood risk assessment that takes into consideration for onsite routes and the infrastructure needs to reach access routes. The level of vulnerability of the access/egress routes are specifically set out in the policy, along with considerations for early warnings, and requirements for designed for and more extreme flooding events.	None.
"Low car" or car free development is likely to be pursued here, but SPS3 does not explicitly address how overspill parking onto surrounding streets will be prevented or managed, or how servicing and visitor access will be handled without harming local safety and amenity. Given the flood, access and amenity context, the Plan should make clear how car free expectations will be enforced and what supporting measures (e.g. CPZs, car club provision, secure cycle links) are required to ensure that housing delivery does not simply displace parking and generate traffic pressures on neighbouring streets, contrary to NPPF	While the plan overall promotes development in sustainable locations and active and sustainable travel modes, there is no requirement for this to be a low car or car free development site.	None.

principles on safe and suitable access for all users.		
The policy does not explicitly acknowledge that building on part of an existing green, permeable and potentially biodiverse site in Flood Zone 3b is an exception to the general approach of steering more vulnerable uses away from high flood risk, and it does not clearly set out why there are no reasonable alternative sites for this scale of affordable housing.	The allocation policy includes site specific requirements for surface/ground water assessments, incorporated sustainable drainage systems and management plans to deal with surface water flooding risks. All suitable and available sites with development potential that are deliverable and sited in suitable/sustainable locations are considered as part of our efforts to address the city's housing need. The plan also recognises the importance of public open space, and other forms of green infrastructure.	None.
While LNRS alignment and SuDS are required, the Plan does not provide a clear, quantified comparison of existing biodiversity and green cover with what will exist post development, nor how any net loss in functional habitat or green infrastructure will be avoided given the reduced open space footprint.	The policy includes descriptions of key onsite ecological features that are expected to be retained (protected species, wildlife corridors) and the plan includes an urban greening factor policy (policy G3) which includes minimum requirements for green cover for development sites of this scale. The approach taken by the plan with respect to provision of green infrastructure takes into account enhancements in quality of GI as much as the quantity. The LNRS mapping tool sets out suggested measures that could potentially enhance the level of onsite biodiversity. While the details of those measures are not included in the policy for conciseness reasons, the policy clearly	None.

	signposts the LNRS resource as a source for further site appropriate detail.	
This site is not appropriate and a prime example of where Policy E1 needs to be strengthened to be effective. See our comments on Policy E1. Homes should be built on vacant , brownfield sites currently allocated for employment, and not on sites such as this.	Refer to OCC responses to policy E1 representations.	Refer to OCC responses to policy E1 representations.
The 2005 Green Space Study assessed the quantity, quality, and value of all green space in Oxford. Bertie Park wasn't one of 16 play areas judged to be surplus. The 2022 GI study didn't find Bertie Park to be surplus, citing it as an example of a small, but multifunctional park. Technical Advice Note 9: Green Spaces (TAN9) states "Outdoor sport and recreation facilities shown on the Policies Map as protected by Policy G5 are in use and not surplus … Other open spaces that are not protected on the Policies Map would need to be considered on a case-by-case basis, with strong evidence that they are surplus …. It is likely this case would need to demonstrate a long-term lack of public access and/or use." Bertie Park has been removed from the list of Oxford Parks, but OCC have neither demonstrated lack of access or lack of use.	The Green Space studies are an assessment of existing open spaces, areas of deficiency etc and do not make a judgement on what spaces are surplus. Those kinds of determinations are made by the Parks and Open Spaces department, who are responsible for the management of green spaces in the city and their determination lies outside the remit of planning officers.	None
The draft plan states that the GI network "performs a vital role in supporting the health and wellbeing of our residents and the wider environment. GI sites are particularly important for the 'multi-functional' role many of them provide." Bertie Park is currently considered to be multifunctional. If shrunk to	The allocation policy does not have specific size requirements for the provision of green space, but applicants will have to demonstrate compliance with the requirements of G1 and G3 (Urban Greening Factor). The current application does not in itself indicate that what	None

20% of its current size, it will no longer be 'multi-functional.' There is potential to significantly increase housing provision at this end of Hinksey Park ward. It makes little sense to decrease open space provision at the same time.	has been submitted will be compliant with the emerging plan.	
TAN9 says the capacity of replacement pitches should fully replace what is lost in terms of amount of games that can be played, or pitch capacity and be "easily accessible to the same community." There is no evidence that this is possible because the only existing facility in Fox Crescent is significantly smaller and has no capacity whatsoever for enlargement.	Policy G1 has different requirements for proposals affecting supporting spaces (G1B) in relation to outdoor sports pitches and parks and other amenity/accessible green spaces.	None
The site capacity assessment states: "Based on current and historic uses, land contamination risks on this site are low." There is no evidence for this. It also misleadingly states that there is a live planning application for 31 homes with 're-provided' MUGA and play area on site, implying a precedent whereas this has been advertised as a departure from the local plan policy. This implies that: • Loss of the open space is acceptable, whereas the live planning application also includes mitigation for loss of open space. • Reprovision of the MUGA on site is appropriate, whereas TVP state that the MUGA too close to homes. SPS3 requires "replacement of the MUGA" with "an alternative type of facility or by improvements to the capacity of an existing one."	The site capacity assessment is produced as part of the supporting evidence, and is based on the best available factual knowledge of the site at the time it was produced. Information sources include council owned and other databases, planning records and input from officers in other council departments. The application being referenced had not been determined as at the time of writing of the assessment, and does not in itself indicate compliance with the proposed policy either way. Representations on the detail of live applications can be submitted for consideration through the consultation process for planning applications.	None

We object to the proposed allocation of this site for housing and consider it to be unsound. Whilst we are aware that the site has previously been allocated for housing, this should not come at the expense of a public playground for children and families. Other sites should be explored which does not result in the loss of a well-used community facility which has caused significant local concern.	All suitable and available sites with development potential are being considered as part of our efforts to address the city's housing need. The plan also recognises the importance of public open space, and other forms of green infrastructure. The allocation policy seeks to balance between providing housing on a suitable site and ensuring that the key function of the site as a public open air recreation ground is retained.	None.
Sports England has made a representation relating to Policy SPS3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Refusal as next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford. Heritage and amenity must be preserved.	Representations on the detail of live applications can be submitted for consideration through the consultation process for planning applications.	None.
Natural England has made a representation relating to Policy SPS3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS4: Cowley Marsh Depot

POLICY	**SPS4**
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**SPS4**

All respondents **raising objections** on this policy/chapter	85.1	104.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Sports England has made a representation relating to Policy SPS4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy SPS4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS5: Crescent Hall

POLICY	SPS5
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPS5	
All respondents **raising objections** on this policy/chapter	105.15	138.52

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

In the policy, replace “minimum number of dwellings to be delivered on the site is” with “development is expected to deliver around”. Delete criterion c) of policy which notes that the potential presence of priority species/ habitats on the site should be investigated and any impacts addressed accordingly.	The requirement for a minimum number of dwellings should be replaced with “expected to be delivered” is “around”. This criterion is necessary as it has been discovered that there is the potential for protected species to be present on site, therefore the requirements of Policy G6 will need to be met.	None
Substantial Roman pottery activity has been identified in the general area.	The Council’s archaeologist has confirmed the potential for the site to contain archaeological remains is low to moderate. (The site is within a very large zone of general potential for Roman kilns).	None

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Policy SPS6: Former Iffley Mead Playing Field

POLICY	**SPS6**
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**SPS6**				
All respondents **raising objections** on this policy/chapter	27.1	59.12	81.13	85.11	138.51
	151.1				

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**

Unsound as not justified – Site unsuitable for cramped housing. Green space is more valuable here, proximity to SSSI. Heritage and amenity must be preserved. Allocation removes a playing field that could help to serve this need for pitch space.	The site is an existing allocation in the Oxford Local Plan 2036 and it is still the landowners intention to develop it.	None
Historic England has made a representation relating to Policy SPS6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England has made a representation relating to Policy SPS6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Unsound as not positively prepared, justified or effective – comments made in relation to the outline planning application for the site. These include comments relating to flood risk, access (including for deliveries, refuge and emergency vehicles), number of dwellings, parking and a cycle route on adjacent land.	Representations appear to relate to evidence submitted in support of a live planning application that has not yet been determined, not in relation to the proposed site allocation policy.	None

Policy SPS7: Kassam Stadium

POLICY	**SPS7**
All respondents **supporting** policy	81.14

COMMENT SUMMARY	OFFICER RESPONSE
Historic England support this policy.	The support is welcomed.

POLICY	SPS7				
All respondents **raising objections** on this policy/chapter	1.3	30.16	47.18	57.15	129.1
	140.8	89.25	85.12	138.44	104.7

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
There should be a more strategic vision for linked sites across this area the developments proposed for south of Grenoble Road.	The draft policy CBLAOF of the Oxford Local Plan does look to steer development across this area, setting out a number of criteria to guide development to meet the needs of the area, even when it is taking place on different sites, with different landowners and timescales. Furthermore, the Cowley Branch Line Densification Study looks across the whole area around the Cowley Branch Line. Download Cowley Branch Line Densification Study Stage 2 | Oxford City Council	None.
There should be a more strategic vision for linked sites across this area the developments proposed for south of Grenoble Road.	There should be a more strategic vision for linked sites across this area the developments proposed for south of Grenoble Road.	None.
Firoka recognise that the primary objective of Policy SPS7 is the delivery of the minimum housing requirement of 290 homes and understand that, once this is achieved, employment-related and complementary uses are acceptable on site. Firoka has concerns this	The intention of the allocation of this site is that it comes forward as a housing-led development. Housing is to be the primary use of the site and other uses are secondary to that. The approach of the plan, captured in the employment strategy in Policy E1, is to protect	None.

is not strictly justified but accept it as long as employment-related uses would not be capped if following a design-led approach. Supporting text should therefore be added to recognise that 'secondary' in terms of this policy refers only to the primary requirement to deliver the minimum number of homes and other uses being secondary to that.	only key employment sites and to allow new employment on these sites and in the city and district centres. This also follows a sequential approach for these town centre uses. In addition, there are sites in lawful use for employment uses, and these could also be intensified in employment use if justified by the sequential approach. Given the lawful use of this site and the flexible approach across linked sites SPS11 and SPS13, the policy allows for employment-use on this site. But housing use is intended as the primary use of the site.	
Redevelopment of the Kassam Stadium and Overflow Car Park sites will be a large-scale multi-phase development interdependent with the stadium replacement scheme. As a result, it is possible that certain new uses will be developed across the sites before the stadium use is relocated. The ensure effective and deliverable implementation of the allocations, it is requested that the supporting text clarifies that allocated uses may be developed across the sites prior to the removal of the existing stadium, where this forms part of a masterplan strategy.	Clarification cannot be added to the supporting text, but it is agreed it would be helpful to add clarity about the stadium to the Policy and a main modification is proposed.	This site is linked to **SPS11** and **SPS13**, and a flexible approach will be taken to how the required uses are spread across the sites, but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall. Full redevelopment across the sites is interdependent with the stadium replacement scheme, but allocated uses may be developed across the sites prior to the removal of the existing stadium where this forms part of the masterplan strategy.
Redevelopment of the main stadium land for housing or mixed is dependent on Oxford United FC relocating to an alternative, deliverable stadium. Until there is a secure, deliverable relocation scheme with an agreed programme, the availability of the existing stadium land for substantial redevelopment	Oxford United Football Club lease the site from Firoka. This model is not considered by the club to be a sustainable model for them as they are at the whim of the landowner as regards terms and conditions of the lease, including cost, renewal dates and how the site is used. This is why the club itself has been looking for a site	None.

within the plan period is uncertain. Although the club is 'hopeful' work can start at the Triangle this year, necessary funds are needed, and time to build it, and the issues around foul-water drainage are yet to be resolved. It should be a condition of any planning application that OUFC would be able to stay at the Kassam. The replacement of local community facilities should also be a condition of any proposed development. Treating the full SPS7 housing number as available in the early or middle years of the period may therefore introduce risk into the housing trajectory and 5 year supply.	they can bring forward. The Triangle site in Cherwell was identified, plans drawn up and planning permission granted. Regardless of the phasing and delivery of that, the landowner can choose not to renew the lease at the Kassam. The policy could prevent any development of the site until the stadium is replaced, but it can't make sure the lease is renewed. Whilst it might be considered that the landowner would choose to renew the lease rather than have an empty stadium (if the stadium had not been replaced by the time of renewal), given the other uses of the stadium as a conference centre, etc., as well as the opportunity to develop the overflow car park and Ozone Leisure Park, it is almost inconceivable that policy wording preventing any development of the site until the football club has a new home would result in a renewal of their lease if that proved to be what they desired. A large football club is a very specialised use. What the policy does do is ensure reprovision of the local community element of the facilities. Ultimately, the approach taken is considered to be the approach that will make best use of the site, which is important given Oxford's constraints.	
The policy cross-references Policy R5 in relation to contamination, but we (Firoka) believe this should cross-reference Policy R7.	Agreed that there was an error in the cross-referencing and this is correcting with a minor modification.	Minor modification to Policy SPS7 to correct cross-referencing '...and remedial works may be required (**Policy R~~5~~7**).

The Policy sets out a requirement for 10% of the overall site area to be provided as open space. This is not consistent with Policy G2, which requires 10% of the residential area (on mixed-use sites) to be public open space.	The cross-reference is considered useful as the Policy G2 will have some influence over how the site is developed. However, it is agreed that an amendment to the wording of the cross reference to avoid confusion would be useful.	Minor modification to the wording of the cross reference At least 10% of the area of residential use site~~s~~ should be provided ~~used~~ for public open space (**Policy G2**).
Policy SPS11 establishes open space and car parking as suitable uses within Flood Zone 3. For consistency, Firoka requests SPS7 includes specific reference to car parking and open space as suitable uses within Flood Zone3.	The Policy SPS11 is not affecting in any way what is or is not a suitable use in the flood zone. It is not necessary to state all the uses that would be suitable in a flood zone, and that would be impossible because it would depend on the sequential approach and so on. The reason SPS11 refers to the potential uses in the southwest corner is because the high level of flood risk in that corner requires a design response, and the policy acknowledges this, with guidance on a solution. Such guidance is less necessary on SPS7 because the pattern of flood risk does not create a need for a particular design response.	None.
It is important that sufficient parking and access is retained to keep remaining leisure uses viable and accessible for local residents and visitors.	There is a considerable amount of surface level parking around these sites currently. It is expected that this level will reduce as it is not desirable to have such a car-dominated development. Public transport contributions will be required, and the re-opening of the Cowley Branch Line for passengers will also help to ensure easier access to the site by pubic transport. Improvements to cycle and pedestrian access into and across the sites will be more important to ensuring accessibility to local residents than retention of large amounts of car parking.	None.

Oxfordshire County Council has made a representation relating to Policy SPS7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England has made a representation relating to Policy SPS7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy SPS7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS8: Land at Meadow Lane

POLICY	SPS8
All respondents **supporting** policy	No representations were received in support of this policy.

POLICY	SPS8				
All respondents **raising objections** on this policy/chapter	56.1	2.3	3.1	3.2	7.2
	13.1	14.1	16.1	17.1	23.1
	27.2	31.1	32.1	47.19	53.1
	56.2	57.16	61.1	70.1	80.1
	83.1	95.1	90.11	99.1	96.1
	97.1	116.1	141.1	142.1	143.1
	145.1	144.1	139.17	147.1	148.1
	158.1	153.1	152.1	151.2	125.1

	127.1	100.1	162.1	138.45	56.2

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Site should not be allocated as the Council now has incontrovertible evidence that the LP2036 allocation of the site was a product of procedural and consultation flaws and that the site is not a suitable development site. An ecological assessment was not carried out before allocation in the OLP2036. The fact the site is in the Iffley Conservation Area was not taken into account. The Council seems determined to retain it as an allocation because of obduracy and sunk costs.	A habitat survey was carried out to inform the allocation in the OLP2036. The horse prevented the surveyor gaining full access to the site, so a best assessment was made from the edges. This was all clear in the supporting evidence for the OLP36. The intention with the surveys at local plan site allocation stage is to identify whether there is likely to be any 'showstopper' habitat interest that would likely prevent development. More detailed ecological assessment would then be needed to support any application. These will often need to include specialist species surveys. Since the allocation of the site, biodiversity assessments have taken place that have given more detailed information and have shown more ecological interest than was known about at the OLP36. The interest is particularly in terms of the specific species (invertebrates, badgers). At this point there is nothing to say conclusively that these species can't be translocated, or remaining habitats enhanced on site to make enhanced provision for them- or a combination of both.	None.
The site has no minimum housing allocation. The Council is therefore accepting that the site is so constrained that it may be unable to	The site is assumed to have a capacity of more than 10 units or it would not have been taken forward for an allocation. No minimum housing	None.

deliver any development in a sustainable and/or policy compliant manner. Allocation of the site is inconsistent with the OCC policy of not allocating sites where assessments show that they do not have the capacity for 10+ dwellings and the treatment of other sites on this basis (1 Pullens Lane, 2 Harberton Mead, Land off Harolde Close).	requirement is given in the policy to recognise the sensitivities of the site. An alternative might be to give a minimum capacity as 10, as the very least number that it is considered the site could deliver. However, there is a risk that this could be seen as harmful to the consideration of the live application, because it may be interpreted as saying that the number in that application is too high, which would be a premature assumption. Instead, no minimum number is given to enable full flexibility to respond to the sensitivities of the site in the most appropriate way should a future alternative application be brought forward.	
There are reasonable alternatives for housing in Oxford on brownfield sites designated for employment, which the draft Policy E1 allows to be brought forward for housing. It would be more effective to redesignate them for housing. There are many former retail sites that could be used for housing. Oxford does not need more hotels- make the sites available for social housing.	Policy E1 only protects Key Employment Sites, and even on these allows some housing. Known employment floorspace in the pipeline, mainly on these protected Key Employment Sites, is sufficient to meet employment needs. The Plan must consider employment land needs as well as housing. When identifying housing capacity, it is essential that this is well evidenced and each site must be considered developable, which means they are in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed for housing. When there are no indications that landowners are interested in reverting commercial sites to residential, and when viability evidence suggests many of these uses are currently of most value, an assumption that these sites will	None.

	come forward for housing can't be made. The commercial Use Class E is very broad and allows change to a lot of uses, which means policy can't simply require that these sites in lawful commercial use change to housing.	
Criteria i) and j) allow for decision-making to be made in a vacuum, enshrining a presumption in favour of development and not requiring applicants to submit adequate supporting information to allow the relevant material considerations to be identified and weighed into the decision-making process.	This comment is in reference to criteria i and j of Policy S1 and how they would impact the Meadow Lane site. These criteria simply repeat the NPPF approach, but to avoid that repetition a main modification has been proposed in response to other comments as well to delete those criteria.	Modifications made in response to comments to Policy S1.
The site is of value to the environment of the village as a whole. It will harm the amenity of existing and neighbouring uses (contrary to criterion f of Policy S1). People (from inside and outside) love the tranquility of Iffley and walk there often- please do not ruin it.	The approach to heritage in the NPPF and local plan is that the level of heritage harm must be balanced with the benefits of development. There is considered to be potential for a scheme that responds appropriately to its context and where any residual harm could be outweighed by benefits.	None.
The site is of biodiversity value. Offset requirements for loss of biodiversity and harm to protected species cannot be realistically met, given the lack of other potential ancient river meadow sites within the city. Thus development will lead to a net loss of biodiversity (contrary to policy G4). The Council now accepts it is of at least City Wildlife Site status, and that's what it should be designated and zoned as if the Council is not to depart from its own policies and objectives of the OLP2045.	The site does have biodiversity value. At the current time there is no reason to assume that it is not possible for proposals to come forward that would mitigate and compensate for any loss as a result of proposals, either onsite or sufficiently locally to preserve the features of interest.	None.
The site is an ancient meadow of local heritage significance important for biodiversity and the	It is not considered the case that a development could not come forward that	None.

conservation area. Contrary to criterion h of S1 it does not take account of local historic context or respond appropriately to heritage significance. Development would be contrary to HD3 as it will negatively affect the Iffley Village Conservation Area, especially the setting and views from Church Way noted in the Conservation Area Appraisal. The site is an extremely rare survival of East Oxford's agricultural history and use and illustrates the life of the working classes in Iffley. Agriculture was the main economy. There is intervisibility with nearby listed buildings.	responds appropriately to the heritage significance of the site. The policy gives guidance on some key considerations to ensure this, such as the need for low density and spaces between buildings, allowing views to and from the wider countryside and integrating green features as appropriate to the semi-rural character of the Iffley Conservation Area.	
The development would have a negative impact on an important blue and green infrastructure network and result in loss of flood plain (contrary to criterion g) of Policy S1. It would also be contrary to Policy G6 and Policy G3 as it would be loss of a high scoring urban greening factor area and would have inevitable negative impact on the Iffley Meadows SSSI.	Development would need to comply with policy G7 in relation to flood risk. The area of flood risk is on the western side of the site alongside the small watercourse, which requires a buffer. The area of functional floodplain cannot be developed.	None.
Reducing the area of the remaining Thames flood plain increases flood risks for existing residents in at risk zones and exposes future residents to flood risk. The site is Flood Zone 3b and will likely become more vulnerable with climate change. It is inconsistent with policy G7. There is an ongoing objection from the Environment Agency.	Sites are always classed as being in the flood zone of the highest risk area within the site. There is only a very tiny amount of Flood Zone 3b however, and this will need to be avoided by development. The policy is clear that a sequential approach should be taken to siting development and that a site-specific Floor Risk Assessment will be required.	None.
Access is difficult, along winding, narrow lanes with poor sight lines, and would endanger users	The site would not be expected to generate any notable amount of traffic, but it is agreed it's important that there is safe access and egress.	None.

of the Principal Quiet Route for Active Travel along Meadow Lane and Church Way.	Potential accesses for all site allocations were discussed with the County Council as Highways Authority and they did not raise concerns with the principle of allocation of this site, and they have not made a representation about this Policy SPS8. It is considered that the site can be accessed safely with minimal negative transport requirements. Meadow Lane is identified as an on-road quiet route in the LCWIP, but so are many other routes in Oxford that have significantly more development alongside than Meadow Lane, even if development takes place on this site.	
The low car concept is a poor solution to road traffic will give very real problems in travel to work, school or hospitals. Public transport does not cover those who work outside the ring road or those who work night shifts. It is bad for the elderly or infirm.	Iffley is well connected, with good walking and cycling routes and access to public transport. Some parking, including disabled parking, will be required.	None.
The area is currently subject to a BBOWT's bid to use Heritage Lottery funding to benefit local schools and communities as part of 'Meadow School Iffley' for outdoor education. Use of this land for housing development would preclude this initiative of significant local benefit, and remove opportunities for outdoor education from future operations. There is interest from local schools to use this biodiverse, tranquil and enclosed site for outdoor education.	The plans and intentions to use this site for a forest school or similar cannot affect a decision on whether or not it should be allocated for housing. The plans may not come to fruition and would rely on landowner agreement. The site is not in use at all by members of the public and its last use was as an enclosed piece of grazing land for horses.	None.
A further complication and limiting factor is potential contamination.	This is noted in criterion n of Policy SPS8. There are not thought to be contamination issues of a	None.

	degree that would affect the ability of housing to come forward on the site.	
Local objection to development of the site is active and well-funded. It is important to distinguish between environmentalism and NIMBYism and to avoid assuming that all Iffley residents share the desire to keep this site as a field. I understand the urgent need for more affordable housing and Iffley should do its duty in enabling development of this land, which has, for many years, been used on for grazing ponies and sheep. The nearby Iffley Mead former school playing field is already designated for 90 homes at higher density, and has much more problematic access than SPS8, so displacing the housing planned for SPS8 to Iffley Mead is unrealistic.	Comment noted. It is agreed that increasing density at the Iffley Mead site can't be considered as an alternative to this site. Each site is considered on its own merits and the minimum housing numbers carefully considered to ensure they are realistic but reflect the strong need to deliver homes. Each site with potential for housing needs to be considered in the 'no stone left unturned approach to housing'.	None.
There is an all-too-familiar policy approach- here is a housing shortage, here is an empty space- let's put the two together. This has done great and lasting damage to Iffley and Oxford. Green open spaces in Oxford need to be valued as an amenity. 15 constraints have been identified [in the SA]- the highest number of any site in the OLP2045.	It is the case that the unmet housing need Oxford has meant that all attempts must be made to identify and allocate sites for housing if they are developable. That does not mean that any open space would be put forward or considered suitable. Each must be considered carefully on its merits. Some sites are more sensitive and have more constraints than others. However, if the landowner discussion suggests the site is likely to be available for housing in the plan period and if it is considered a scheme can come forward that responds to, mitigates or outweighs harms then the site is considered for allocation.	None.

The top end of the site, the memorial Field, was for many years a village amenity, and when the site was purchased for development it was promised that the field would remain undeveloped as a village amenity. It would be particularly useful as a public green space, of which there are few, and for a children's play park. Encroachment on the Memorial Field and blockage of public access should be forbidden i any development approval.	When the site was put forward for housing to the OLP2036 by the previous landowner it included the Memorial Field, but the decision was taken not to take that part of the site forward for allocation. The site is not part of the allocation in the OLP2036 or the draft allocation in the OLP2045. The site SPS8 is not large enough to generate a requirement for public open space itself. The memorial field is designated as part of the supporting Green Infrastructure Network, but not allocated for development.	None.
The proposed development gives the perfect opportunity to build a path through the development and the Memorial Field from Meadow Lane to Church Way to carry cycle and pedestrian traffic safely towards Rose hill and Iffley Lock whilst avoiding narrow and dangerous parts of Church Way. This should be a requirement.	The feasibility of this has not been tested and it does not seem as though it would be a requirement necessary to mitigate impacts of development of site SPS8.	None.
Natural England has made a representation relating to Policy SPS8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS9: Littlemore Mental Health Centre

No representations received against this policy.

Policy SPS10: Mini Plant Oxford

POLICY	SPS10
All respondents **supporting** policy	No representations were received in support of this policy.

POLICY	SPS10		
All respondents **raising objections** on this policy/chapter	51.5	81.15	138.46

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The MINI Plant is a constrained brownfield site. As such, it will be challenging to meet urban greening factor requirements through new development proposals. It should not be mandatory to meet a specific amount but to show how urban greening has been considered in the development of a planning application. We suggest the following modification to bullet point a): *a) Proposals should include additional greening onsite to help meet the Urban Greening Factor target <u>where feasible</u> and maximise the other functional benefits this can provide...*	The targets set as part of policy G3 are more conservative than the recommended standards set by Natural England as the Council recognises that there can be challenges with delivering greening on some constrained sites in the city. Applicants have flexibility in how they meet the targets depending on the context of the site and can utilise a range of greening measures to meet the required score. We do not consider that this modification is justified.	None
Sensitivity around heights is an important element in this location but the MINI Plant requires certain heights of buildings to allow for the effective operation of the site. We suggest the following modification to bullet point e):	The prior criterion to this one in the allocation already sets out that building design and arrangement will need to be guided by operational needs of the site, as such, we do	None

e) Whilst there are limited constraints on the site, considerations around heights, scale and massing should factor in how the developments will be viewed from afar and on the approach, so as to reduce feelings of overbearing and dominating of the adjacent streetscape. <u>However these considerations will also need to be balanced with the operational needs of the site.</u> Variations in materials...	not consider that this needs to be repeated again.	
Historic England has made a representation relating to Policy SPS10, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
A total waffle-fest. Good identification of issues, but no targets are set. A more robust policy is required to reduce surfacewater runoff from the very large number of hard surfaces (Red), particularly as the complex is close to the Oxford Sewage Treatment Works (Thames Water). Policy should be amended to ask for reduction in surface runoff with SUDS etc.	The policies of the Local Plan need to be read as a whole and surface water run off is already addressed through overarching policy G8 (SuDS) and G7 (flood risk). Other policies like those relating to green infrastructure provision are also important for helping to reduce run off.	None

Policy SPS11: Overflow car Park at Kassam Stadium

POLICY	**SPS11**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPS11**

All respondents **raising objections** on this policy/chapter	30.17	57.19	81.16	129.2	89.4

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
It is positive that the draft policy states that a flexible approach will be taken to how required uses are spread across the sites, but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall. However, this is important not just in relation to housing numbers, but other considerations such as facilities available for use by members of the public at affordable prices, primary care provision and small retail outlets and ensuring there is suitable land for an integrated transport/mobility hub close to the proposed station on the Cowley Branch Line.	The proposed Cowley Branchline Station is slightly removed from and of the Kassam site allocations, and a transport/mobility hub would not be required on these sites, especially given that the closest site (the overflow car park) would essentially be a dead end for vehicles and would not be a good location for a transport hub. Other considerations are dependent. Wording in the policy says that a flexible approach will be taken to how required uses are considered across the sites, not just housing numbers.	None.
The draft policy states that planning permission will be granted for redevelopment even though Oxford United FC are currently resident at the stadium and have nowhere to move to at the current time. It should be a condition of any planning application that OUFC would be able to stay at the Kassam.	It is agreed that the car park should not be developed if it is required to support the use of the Kassam Stadium. Therefore, a modification is proposed.	Planning permission will be granted for residential-led development and public open space on the Overflow Car Park at Kassam Stadium site, if the car park is no longer needed to support the use of the Kassam Stadium.
The replacement of local community facilities should be a condition of any proposed development.	There are no local community facilities on this site to be replaced.	None.

The landowner, Firoka, supports the flexible approach to how required uses are spread across is sites in the plan, but SPS11 does not explicitly establish this approach and it is therefore requested that Policy SPS11 mirrors the wording of Policy SPS7 in relation to acceptable uses to ensure clarity regarding the distribution of uses across the two linked allocations.	The draft policy already does include the wording: 'This site is linked to SPS7 and SPS13, and a flexible approach will be taken to how the required uses are spread across the sites, but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall.'	None.
Policy SPS11 identifies the potential for a restrictee access from Priorty Road. The landowner, Firoka, says taht there are many potential design solutions for reducing the dominance of private vehicle circulation and impact and current design work has not been sufficiently progressed to evidence the need for a restricted access on site. Requiring a restricted access at this stage risks pre-empting the outcome of detailed transport strategy and masterplanning.	Priory Road, beyond the eastern branch off to serve the houses to the north of the site, does not accommodate vehicles. The road at that point could not feasibly become suitable and an unrestricted vehicular route. It is extremely narrow, without obvious potential for widening, and even if that were possible outside the site, the very narrow width of the tunnel under the Branch Line would severely restrict the potential for the road to become a general access road to serve the site. Reference is only made. The assumption for main vehicular access to this site has always been that it would need to come over the bridge from the south. The draft policy is not overly restrictive but simply reflects the practical reality. The narrowness of the tunnel may rule out use by servicing vehicles, but the benefits of those mean it should be investigated as firmer proposals are developed.	None.
Historic England has made a representation relating to Policy SPS11, which is summarised	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

and responded to in the Statement of Common Ground.		
Oxfordshire County Council has made a representation relating to Policy SPS11, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS12: Oxford Science Park

POLICY	SPS12
All respondents **supporting** policy	130.11

COMMENT SUMMARY	OFFICER RESPONSE
Support the continued allocation of the site for employment and being appropriate for development or redevelopment that modernises and intensifies the employment provision. Welcomes reference to portions of the allocation suitable for higher buildings, notably the central and eastern part of site, closest to the Kassam Stadium and Leisure Complex, while noting the need to respond to the setting of the Grade II* listed Minchery Farmhouse. There is huge potential for intensification of employment floorspace at the Park with the site uniquely positioned to deliver future employment floorspace situated adjacent to a future train station along the CBL and in close proximity residential-led site allocations able to deliver significant residential units to support local housing needs of those employed by companies based at the Park, such as the Kassam Stadium site and overflow car-park site to the east and South Oxfordshire Science Village to the south.	Support is welcomed.

POLICY	SPS12				
All respondents **raising objections** on this policy/chapter	81.7	89.26	104.8	137.1	138.47
	140.6				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The Environment Agency has made a representation relating to Policy SPS12, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Historic England has made a representation relating to Policy SPS12, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy SPS12, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Residential component must be mandatory or it is unjustified to increase employment without adequate contribution to housing.	Oxford Science Park is designated as a Key Employment Site, which Policy E1 defines as "Include nationally and regionally important employment sites that make a significant contribution to the knowledge economy, are significant employers or provide important local services". As such, the priority use for the site is for development of research and development and office employment uses (Class E) that directly relate to Oxford's key sectors of research-led employment, but Policy SPS12 also allows for an element of residential.	None
Minchery Farm is the location of the infamous medieval Littlemore Nunnery and has very high potential for archaeological remains. This site is adjacent to Oxford Sewage Water Treatment Plant.	SPS12 references the Minchery Farmhouse, and the need to respond to the setting of it. Amenity impacts are addressed in Policy R8, which specifically references developments in proximity to the Sewage Treatment Works.	None

Generally supportive of site allocation but propose the following amendments to facilitate the necessary delivery of new footbridges across the Brook to improve permeability from the Science Park to, for example, Littlemore House: (d) With the exception of new footbridges to improve connectivity, A 10-metre buffer to the Brook should be maintained... (e) Parts of the site are Flood Zone 3b, mainly along the Brook, and, with the exception of new footbridges across the Brook, a sequential approach should be taken to locating development on the site. Also given the nature of EIT's intended use of the Science Park, it would not be appropriate in security terms to have areas of open space which are accessible to the public, propose the following amend: (g) "Proposals should enhance and increase the public realm and landscaping of the Science Park, including, where possible, the creation of new ~~public~~ open spaces	The 10m buffer is a requirement to meet Policy G2 Enhancement and Provision of new Green and Blue Features, which is also relevant to Policy G7 Flood Risk and Flood Risk Assessments and has been supported by the Environment Agency. A footbridge has not been identified as essential by the Environment Agency, but that does not preclude an applicant making a case for a footbridge/bridges as part of a planning application.	None

Policy SPS13: Ozone Leisure Park and Minchery Farmhouse

POLICY	**SPS13**

All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**SPS13**				
All respondents **raising objections** on this policy/chapter	30.18	57.18	81.18	140.7	138.48
	104.5				

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
There should be a more strategic vision for linked areas and developments proposed for south of Grenoble Road.	The draft policy CBLAOF of the Oxford Local Plan does look to steer development across this area, setting out a number of criteria to guide development to meet the needs of the area, even when it is taking place on different sites, with different landowners and timescales. Furthermore, the Cowley Branch Line Densification Study looks across the whole area around the Cowley Branch Line. Download Cowley Branch Line Densification Study Stage 2 | Oxford City Council	None
The policy should be altered to take into account that there may be unavoidable delays to development of the new stadium for Oxford United.	This site does not affect the functioning of the football stadium and it is not considered that the policy needs to reference potential delays to the replacement stadium.	None
The replacement of local community facilities should be a condition of any proposed development.	The Policy does say: 'In accordance with Policy C5 community commercial leisure uses should be re-provided...'	None
This site is 3ha, which could be allocated for homes. Policy E1 must be less restrictive in order to allow this.	Policy E1 does not prevent this happening. The Ozone Leisure Park is not a key employment site. However, Policy E1 does also reflect that	None

	employment may come forward not only on existing sites and in the centres, but also at sites already in lawful use for the proposed employment use. The Government introduced Use Class E in 2020, which applies to a very broad range of commercial uses. That means that the Ozone Leisure park already includes Use Class E and much of it is in lawful use for many employment uses.	
The site is within close proximity of Oxford Sewage Treatment Works. Therefore, any redevelopment proposals will need to be assessed and mitigated in compliance with Policy R8 in relation to odour from sewage treatment works.	Noted that Policy R8 may apply in this case.	None
Minchery Farm is the location of the medieval Littlemore Nunnery and has very high potential for archaeological remains.	The Grade II* listed Farmhouse was the dormitory range of the Littlemore Priory. It is noted in the fact box relating to the policy that the site: *Contains Minchery Farmhouse Grade II* listed building. Potential for prehistoric, Roman and medieval archaeology.* Criterion J of the policy also requires that: *Archaeological potential will need to be explored as part of any proposed redevelopment (Policy HD5)*	None
Historic England has made a representation relating to Policy SPS13, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy SPS13, which is	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

summarised and responded to in the Statement of Common Ground.		

Policy SPS14: Redbridge Paddock

POLICY	SPS14
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPS14			
All respondents **raising objections** on this policy/chapter	57.19	90.12	138.49	104.18

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
CPRE is concerned that this site, until recently designated as Green Belt, has considerable biodiversity value. It is rewilded and there is an undisturbed and dark riverside habitat as part of the Thames corridor.	The site was removed from the Green Belt through the Oxford Local Plan 2036 process. Criterion f) of the draft policy, carried forward from OLP36, therefore sets out that 'Compensatory improvements should be made to the surrounding areas of remaining Green belt in accordance with the identification of Opportunities to Enhance the Beneficial Use of the Green Belt Land Report (LUC 2018). A 10m buffer is required to the river. Part of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. A phase 1 habitat survey was carried out to inform the OLP36,	None.

	which did not identify significant habitat that would prevent development of the site. Further biodiversity work to inform the application has not highlighted biodiversity of a value that would be difficult to compensate for.	
The former landfill site has waste to a depth of over 6m and contaminants may be disturbed and pollute river and groundwater. There may be adverse impacts on the SSSI on the opposite riverbank.	Of course the former use as a landfill will have created contamination, which will need to be remediated. Work to understand the contamination and identify suitable remediation has taken place over a long time period to inform development of a planning application. This has confirmed there is a feasible solution to the issue. The Policy, in criterion p, is very clear that proposals '...will need to demonstrate how contamination issues arising from this former landfill site will be resolved.'	None.
The site should not be allocated as it is next to Cowley and East Oxford, with the least amount of green space per inhabitant in Oxford.	It is unclear what study is being referred to. It should be noted that the site is within the New Hinksey area of the 2022 Green Infrastructure Study (which is not identified as having a shortage). In terms of accessibility of green space, the study is concerned with distances to publicly accessible amenity green space, parks and accessible open space. This site is an inaccessible private space. Development on the site would be required to bring forward public open space.	None.
Heritage and amenity must be preserved; the paddock is a very visually attractive gateway to the city.	The key heritage consideration of this site is that it is visible from Iffley Conservation Area and that there is potential archaeology. The policy also notes that design should be sensitive	None.

	to the broader landscape setting (criterion j). The site is an important gateway site, but it is considered that a development can come forward that responds well to this context. Criterion i says: 'It is important that this gateway site into the city centre is designed to give a clear identity.	
The Environment Agency has made a representation relating to Policy SPS14, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Natural England has made a representation relating to Policy SPS14, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS15: Sandy Lane Recreation Ground

POLICY	**SPS15**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPS15**		
All respondents **raising objections** on this policy/chapter	81.19	85.19	138.5

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**

Historic England have made representations against policy SPS15, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England have made representations against policy SPS15, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Should not be allocated, as site is located next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford and this land is required for increasing population and any replacement sport facilities from Cowley/Littlemore.	The allocation requires any development to meet requirements for new open space (as per policy G2), as well as protected green infrastructure (as per policy G1). It also sets out expectations for how reprovision of any lost sports facilities should be addressed.	No further change proposed.

Policy SPS16: Templars Square

POLICY	**SPS16**
All respondents **supporting** policy	30.19

COMMENT SUMMARY	**OFFICER RESPONSE**
Particularly welcome the inclusion of community facilities and medical healthcare facilities among the range of possible uses.	Support is welcomed.

POLICY	**SPS16**				
All respondents **raising objections** on this policy/chapter	47.2	81.2	115.6	89.27	136.2

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
It is noted that the policy requires Templars Square to continue to function as a district centre. However, there is a risk that the combination of reduced parking, nearby LTNs and potential future congestion charging could cumulatively reduce accessibility for some user groups and undermine the centre's role. The policy does not define what level of public parking is considered 'enough' for a district centre that serves a wide catchment, nor how impacts on disabled users, older people families with children and those carrying bulk shopping will be assessed. There should be clearer safeguards and evidence to ensure the centre is supported.	Currently, there is a very large amount of public parking, some of which is not in use, and there is considerable scope to reduce this and make better use of the space. The suitable level of parking will depend on the precise nature of the proposals and will need to be determined when there are detailed proposals, on the basis of the wider transport context at the time. Quality of the public realm and movement for pedestrians, wheelers and public transport access are also important to the success of the centre.	None.
The breadth of uses supported by the policy is positive, but the policy does not give explicit guidance on retaining essential day to day services, e.g. convenience food, pharmacy, banking, post office, affordable cafes, that underpin the centres role for less mobile and lower income households. If housing and higher value commercial uses drive up rents or displace basic retain and service functions then residents may have to travel further afield for weekly shopping and essential services, potentially conflicting with the NPPF aim of supporting local centres and reducing the need to travel.	Many of the uses listed fall into the same use class in the Use Class Order. The planning system cannot control the nature of the user within the suitable use (for example it clearly can't ensure cheaper rather than dearer cafes or food outlets or supermarkets). The policy, whilst allowing a significant amount of new retail, does protect the overall district centre function of the site.	None.
The BNP Paribas Viability Assessment for the Plan recognises that there is no 'particular level	The BNP Paribas Viability Assessment simply acknowledges that there is stark variability in	None.

of affordable housing that most schemes can deliver' and it recommends a 40% target, and says 'site-specific circumstances' must be taken into account. The document does not comment on the viability implications for schemes where there is reprovision of existing affordable housing proposed. Policy SPS16 should specifically recognise that affordable housing requirements will be determined through a site-specific approach. This is in line with the viability assessment recommendations.	viability for residential depending on the location, the nature of the proposed scheme and the existing use. It is therefore necessary to apply some judgement. There is no attempt, for example, to make conversion of R&D to residential affordable, because in many cases, even with 0% affordable housing, it simply won't be. The 40% level is expected to be generally achievable for the types of schemes likely to come forward and expected in the Plan. Policy S4 already allows applicants to demonstrate particular circumstances that justify a need for a viability assessment to inform negotiations about a reduced level or different tenure split of affordable housing, working through the cascade.	
Policy SPS16 should recognise that the redevelopment will result in a reduction of retail floorspace, and residential will be the primary use. The vacant units reflect the changing consumer habits since Covid-19, which, alongside urgent housing need, no longer allows retail uses to take precedence in district centres. Their vitality depends on a suitable blend of uses. The draft policy requires active frontages at ground floor level and this could be understood as site-specific recognition that the residential frontage can also be 'active'. If this is not the case, this should be clarified. The policies map suggests internal areas of the shopping centre are 'District Centre Active Frontage' but an active frontage is an	The policy is not framed in terms of retail floorspace or retail frontages in acknowledgement of the changes to the Use Class Order to commercial Use Class E and also the changing nature of district centres. The policy says that planning permission will be granted for a 'mixed-sed development' that supports the ongoing role as a key part of the Cowley District Centre but that also delivers a 'significant amount of new residential development'. It goes on to say that alongside residential, development should include town centre uses that provide active frontages at ground floor level. Retail is listed as one of a wide range of town centre uses that may be delivered.	None.

outward and street-facing unit/frontage. Therefore, this should be aligned with outward facing active units only. The landowner (ORVIL) can assist with defining existing active frontages.	In terms of the active frontage, the policies says that active frontages will be required along 'identified principal routes'. This acknowledges that these may well be along the outside edges facing the existing main roads, but that there should be a principal route with active frontages that cuts through the middle of the development, ensuring people are drawn into and through the site. This is considered important to the successful long-term redevelopment of the centre. However, this means there is full acknowledgement that the redevelopment will not simply be expected to take forward the same placement or amount of active frontage as now, and that identifying them after redevelopment will be led by the design of the development; it is just important that that does include a principal route through the site. Being that it will be a principal route, it is not considered it would act like an 'internal' space. Within the active frontage there will be options for a wide range of town centre uses at the ground floor, far from being restricted to just retail. Also, the percentage thresholds means non-active uses can be interspersed within it (e.g. residential entrances if some of those need to be act ground floor facing the principal route/s). There is therefore no need to weaken the definition of an active frontage by including residential within it.	

The policy should acknowledge deliverability considerations that require a phased approach to be taken.	Policy SPS16 does not preclude phased development. However, it could give a more explicit acknowledgement with an amendment to criterion d.	Proposed main modification to acknowledge the potential for phased development: d) A masterplan should be produced to help organise services, access, movement routes, landscape, public realm and heights across the site. It is important that any piecemeal development or any phasing of the delivery does not prejudice the overall aim of a comprehensive regeneration across the site.
Historic England has made a representation relating to Policy SPS16, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The ICB (now NHS Thames Valley) has made a representation relating to Policy SPS16, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy SPS16, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS17: Unipart Site

POLICY	**SPS17**
All respondents **supporting** policy	117.7

COMMENT SUMMARY	OFFICER RESPONSE
The Regulation 19 Submission Draft included Areas of Focus for development, including the Cowley Branch Line, Littlemore and The Leys Area of Focus. This area contained several of the city's key employment sites with the Unipart Site adjacent to the Area of Focus. The site's acceptability for Industrial (Class B2), and Storage or Distribution (Class B8) uses with ancillary offices, together with Research and Industrial Processes (Class E) uses and other complementary uses is supported. Logicor are also exploring measures to currently improve the use of the site and the policy principles and site-specific requirements of Policy SPS17 remain consistent and are considered acceptable.	The Reg. 19 Proposed Submission draft for the Oxford Local Plan 2045 refers to this Area of Focus (AOF) as the Cowley Branch Line AOF. The Unipart site is included within the Cowley Branch Line AOF in the Oxford Local Plan 2045. Support for mix of uses is welcomed. We note that the policy principles and site-specific requirements are considered acceptable.

POLICY	SPS17	
All respondents **raising objections** on this policy/chapter	57.2	81.21

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Site has been subject to an allocation since 2016 without much change in the meantime. Most of the site is used for parking or storage. It represents a huge failure to redevelop what is effectively a Brownfield site and a large one. Oxford City Council provides no explanation as to why this is. Could have housed the proposed Oxford United Football stadium instead of building this on the Green Belt.	As part of developing the Local Plan 2045, confirmation has been sought from landowners as to their intentions for bringing forward sites that are subject to an allocation, which is important for demonstrating that the allocation is deliverable. However, while an allocation increases certainty for landowners/ developers bringing forward sites, the Local Plan itself cannot force development to come forward. The	No further change proposed.

Other options like increase in business rates for sites like this would encourage owners to progress redevelopment. Pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes and an affordable homes crisis in the City. Should be stated that residential use of this site is appropriate. This site is 30.63 hectares which could all be allocated for homes. Policy E1 must be less restrictive to allow this	Unipart site itself is likely to play an important role in helping the city to meet its identified employment land needs. Business rates are governed by their own set of processes and legislation. It is not within the scope of the planning system to make changes to business rates. While Policy E1 does protect Key Employment Sites, it also introduces a permissive approach to housing delivery whereby landowners/developers can, if they choose, bring forward proposals for housing at Key Employment Sites, subject certain policy criteria being met. See officer response to Policy E1 for further details.	
Historic England has made a representation relating to Policy SPS17, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy MRORAOF: Marston Road and Old Road Area of Focus

POLICY	MRORAOF
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	MRORAOF				
All respondents **raising objections** on this policy/chapter	47.21	93.1	105.6	106.1	138.53

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Text of the policy emphasises the need to manage commuter parking and to expand CPZ coverage around major employment and education sites. There is limited publicly available evidence within the Plan grappling with transport implications e.g. how design of CPZ will benefit local residents/businesses; how access for patients, carers, tradespeople and those with irregular working hours will be maintained as hospital and university activity intensifies; how displacement risks will be assessed at the area wide scale; what complementary measures will be used to avoid creating new congestion or safety issues on adjacent streets etc. A stronger link between MRORAOF and supporting highway/traffic evidence would help demonstrate that this test is met. Several suggestions made relating to how to address this point, including that the policy should: – include explicit reference in the supporting text to the transport, parking and environmental evidence that underpins the AoF (e.g. area wide modelling, parking surveys, air quality assessments).	The Area of Focus policies set out broad spatial considerations relevant to the area which could be applicable to multiple development sites. Unlike the more detailed site allocations policies, it does not set out details like minimum housing numbers, or specific site requirements, and its considerations are therefore much more general as they need to apply to a much larger area and a more varied set of development proposals. As such, they are not supported by the types of assessments suggested in the comment, nor would it be feasible to undertake them at Local Plan stage. Whilst the Local Plan has limited influence over transport management, Policy C6 sets out requirements for transport assessments and travel plans which it requires to be submitted for development that is likely to generate significant amounts of movement. This policy includes criteria that require the needs of people with disabilities and reduced mobility in relation to all modes of transport to be addressed. Meanwhile, policies C7 and C8 set out standards required for cycling provision and motor vehicle parking. These policies will	No further change proposed.

– require that development proposals and any CPZ expansion in the MRORAOF area be supported by Transport Assessments that consider cumulative impacts e.g. traffic displacement to adjacent streets and effects on air quality and noise. – clarify that CPZ design must ensure adequate, affordable permit and visitor provision for local residents, carers, patients and service users, with particular regard to those with disabilities or mobility impairments.	apply to applicable development within the AoF alongside this policy and as such, they do not need to be repeated in here. We respond on the matter of CPZs below.	
On CPZ and safeguarding Community Facilities Include a criterion that CPZs and traffic measures around key community assets (such as community halls, schools, health centres and local shops) should be designed to maintain reasonable short stay and blue badge access, with time limited bays or shared use arrangements where appropriate. Encourage a phased or pilot approach to new CPZs or traffic restrictions within MRORAOF, with monitoring of traffic, parking and environmental indicators, and a clear mechanism for adjusting measures if unacceptable displacement or access problems arise.	Controlled Parking Zones (CPZs) are designed, managed and maintained by the local highways authority, which sits under Oxfordshire County Council. As such, the Local Plan has no influence on how these are designed and they are not addressed in the AoF policy. Nevertheless, applicants will need to consider the requirements of policy C6 alongside this policy and, as set out above, this policy sets requirements for transport assessments and travel plans and includes criteria requiring needs of people with disabilities and reduced mobility in relation to all modes of transport are addressed.	No further change proposed.
AoF includes, or is adjacent to, several large development sites (for example along Old Road and Marston Road) that will generate construction and service traffic as they are built out. MRORAOF does not explicitly address: implications of this (e.g. where construction	Whilst the point is acknowledged, construction management plans are a requirement of policy C6, which would be applicable in or out of the AoF, as such there is no need for this to be repeated.	No further change proposed.

workers will park, how transport will be impacted by temporary transport restrictions/measures. Additional clarity in MRORAOF on construction and servicing strategies would improve confidence in deliverability. – To address, policy should Require that major development proposals within the AoF include a construction and servicing parking strategy, demonstrating how contractor and service vehicles will be managed without causing unsafe or illegal parking on surrounding streets.		
The policy needs to address environmental health impacts more. AoF's seeks to support access to major health facilities, and refers to the need to improve active travel connections and public transport, and the Plan overall aims to improve air quality and reduce carbon emissions. If parking controls and route restrictions displace traffic or cause longer diversions, there is a risk of localised increases in: traffic volumes on certain streets, noise and air pollution, and perceived severance for pedestrians and cyclists. – Policy should include environmental and health safeguards e.g. requiring that significant changes to traffic patterns or parking controls within the AoF be subject to proportionate air quality and noise assessment, with mitigation (e.g. traffic calming, planting, low emission bus routes) where risks are identified. – Should commit to ongoing engagement with residents and stakeholders,	Similar to the above, these issues should be picked up through Policy C6's construction management plans requirements. Additionally, other policies in the Local Plan are also of relevance, including Policy R4 (which addresses Air Quality impacts and requirements for air quality assessment), and Policy R8 (which seeks to ensure development mitigates impacts on environmental health and amenity).	No further change proposed.

including hospitals, universities, parish councils and community groups, to review the effectiveness of measures and ensure they continue to support both sustainable transport and local accessibility.		
The AOF needs to better grapple with the cumulative impacts of development across the three allocations (SPE3; SPE6 and SPE11) within its boundaries and should be brought together in the plan to make clear their geographical proximity. A range of cummulative impacts that need to be considered are highlighted including: – Impact of 160 additional dwellings/or student rooms equivalent, needs to be recognised in the provision of sufficient infrastructure/facilities (e.g. additional demand on buses, local shops, pharmacies, doctors and dentists). – Impacts on the SSSI, including consideration of how mitigation in one area could impact mitigation needed/already delivered in another area. Also how this would affect sewage system and knock on impacts to SSSI. – Exacerbating already present flood risk (e.g. Ferry Road quoted as example of area already susceptible). – Also need to consider currently unknown future intentions of development on other sites such as the Clive Booth	The purpose of the Area of Focus policies is to set out broader considerations that could apply to any development coming forward within the area, including with consideration for the existing character and sensitivities of the area. Where particular site allocations are included, these then provide more site-specific requirements which are informed by evidence such as the site capacity assessments (included in the evidence base). We have sought to ensure that the MRORAOF policy references many of the sensitivities picked up in these comments, e.g. sensitivities of the SSSIs, the historic environment etc. The three allocations referenced also discuss these issues in greater detail in the specific context of those sites. There are then other policies in the Local Plan which will also apply, e.g. Policies G6 (protecting biodiversity), G7 and G8 (flood risk and SuDS), HD3-5 (heritage assets). Whilst the impacts of each proposal need to be considered on their own merits, as and when they come forward, this policy framework is also intended to help mitigate negative cumulative impacts across the wider area as far as possible through the Local Plan process.	No further change proposed.

student village and how this could further impact infrastructure/services. – Impacts on the conservation area of this development (and future development), as well as on green infrastructure in the area. The three sites need to be developed in a way that reflects the character of the area described in the draft plan, and to provide a coherent – though not uniform – frontage to the Marston Road.		
Welcome the inclusion of this policy which notes the qualities of the area and seeks positive change, however, with regard to the intention to stimulate sustainable development, the policy would be improved by modifying the description of the area removing references to 'rural' character which are inaccurate. Whilst the policy's description of the area as 'green' is representative, we do not feel the reference to 'rural' reflects its character and may hinder efficient use of land desired by the Council. The area's verdant character formed by mature trees and parkland in the vicinity part of the patchwork of the city, rather than countryside. This is particularly so in the context of the redevelopment of Oxford Brookes' student accommodation adjacent to Cuckoo Lane (ref. 21/01185/FUL) which features blocks up to six storeys in height. The reference to a rural character should be omitted to ensure development policies in this area are effective	Whilst it is acknowledged that there is some subjectivity to how the area could be described, and that the nature of the area varies somewhat, our analysis and the text in criterion g) of the policy is supported by the Oxford Landscape Character Assessment (see addendum produced in 2022) which generally describes the area in and around Cuckoo Lane in this way (e.g. see 7A Headington Hill). The description of the wider AoF in the supporting text does not suggest that the entire area is 'rural' in character, however.	No further change proposed

and the plan is sound. This change will not undermine the purpose of the policy or desire to maintain the green character but will remove a potential barrier to beneficial development.		
Incorporating green spaces such as Headington Hill Park, South Park and affects the Lye Valley is unjustified and ineffective. These are also identified as core green spaces, whilst the AoF states that permission will be granted for new development within the AoF, and this leads to confusion as to which policy (either G1 or the AoF) prevails. Difficult to understand the logic of incorporating public green space unless to allow building on green spaces or to privatise it.	The policies of the Local Plan need to be read as a whole, as such both apply. The inclusion of the green spaces within the AoF does not mean they are being suggested as development opportunities. They form an important part of the wider local context for any development proposed within the AoF as such it is not considered appropriate to cut them out of the AoF boundaries.	No further change proposed.
Seeking "opportunities" to "consolidate and reduce" car parking is meaningless without clear objectives set is ineffective	It is considered important to ensure that opportunities are sought to reduce car parking in the AoF.	No further change proposed.
Policy is nonsensical linking different sites and areas that have nothing to do with each other with different constraints.	The Council considers this to be an area where change is anticipated over the plan period resulting from new developments in the locality. There are also various sensitivities – e.g. the proximity to the SSSIs and various heritage assets which need to be considered. As such, it is considered important to set out some broad considerations through the AoF policy which can help guide these changes in an appropriate way.	No further change proposed.
The policy should be amended to more clearly reflect the emphasis on densification and the more efficient use of land highlighted in the supporting text. In particular, the policy should acknowledge the opportunities identified within	There is no need to repeat this in the policy. The emphasis on efficient use of land is repeated throughout the plan, and particularly within Policy S2 (High Quality Design).	None

the Area of Focus to make more efficient use of land.		
The Site Allocation policies for Oxford Brookes; Old Road Campus; and Clive Booth Hall have disappeared. These addressed specific site constraints and this is unjustified and unsound as each site has its own constraints (e.g. Old Road Campus has recently had a nearly 500 space underground car park approved although immediately above Cowley Marsh and the Lye Valley South Fen).	Previous allocations in the existing Local Plan do not need to be automatically carried forward into the new Local Plan and their absence does not impact the function of this policy. Indeed, where allocations are present (or not), the AoF policy is a separate consideration for applications coming forward within its boundaries. For reference, development at Clive Booth Hall/Oxford Brookes is already underway and Old Road Campus is a key employment site, as such, applications on the site would be addressed through Policy E1.	No further change proposed.
Cuckoo Lane runs from Old High Street to Marston Road and is a local heritage asset, this should be incorporated into the relevant site policies (eg: John Radcliffe), Pullen's Lane, Headington Schools, Gov and Harcourt, Oxford Brookes) or be a separate policy, it extends well beyond the MRORAOF area so is ineffective and unsound, muddled.	The AoF already references Cuckoo Lane and as such this would need to be considered where relevant for any development site within the AoF boundaries. Additionally, as a non-designated heritage asset, this would need to be considered through the overarching Policy HD4 – including for applications outside of the AoF.	No further change proposed.

Policy SPE1: Churchill Hospital

POLICY	**SPE1**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPE1**

All respondents **raising objections** on this policy/chapter	90.13	105.8	138.54

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Natural England has made a representation relating to Policy SPE1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Amend criterion b) so that other suitable uses can have an operational and/or research link to hospital healthcare and education and not just operational and/or research link to this hospital.	The policy lists a number of uses linked to the hospital which we consider to be suitable and that the proposed amendment would be inappropriate.	None
Excessive parking provision is responsible for air quality, health and environmental issues caused by daily traffic congestion in Headington. Statements re: Lye Valley should not be included in this site policy but applied generally as discussed in response to G6 and G7. Reduce parking in exchange for further development. Criterion k) should be amended to "reduce car parking with no increase permitted". Add in "operational phase" to criterion d).	The site allocation policy wording is specific to the potential impacts of development at the Churchill Hospital site on the Lye Valley SSSI. It is included in addition to Policies G6 and G7. The policy wording is explicit in identifying that the site is currently dominated by surface level car parking and requires that this is rationalised to make the most efficient use of land. Development proposals will need to demonstrate how parking and car movement has been addressed and where reductions can be made. Criterion d) refers to both construction and the design of development proposals. This could be amended to provide greater clarity.	**Mod proposed to update of Policy SPE1 as follows:** *A buffer zone should be provided during the construction period to avoid disturbance to the adjacent SSSI. ~~and a~~ Additional protective and enhancement measures for river and wetland restoration, as required around the watercourse and ecological buffers zones (minimum 10metres from bank top), should form part of development proposals.*

Policy SPE2: East Oxford Bowls Club

POLICY	SPE2
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPE2				
All respondents **raising objections** on this policy/chapter	82.2	91.1	89.28	85.17	138.55

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The development on greenfield land is not justified. It would bring unnecessary environmental damage to the local GI network and conflict with the plan's own Policy S1 and harm the setting of the Bartlemas Conservation area (already damaged by housing at Sinnet Court). The Conservation Area Appraisal says that the rural 'undeveloped' character of Bartlemas is paramount to the area's significance and historic elements of seclusion and isolation should be preserved and enhanced. The 'countryside' setting of the listed Farmhouse and Chapel and open views across the area to Oriel Wood and the secluded character of Bartlemas lane and the allotments will be harmed by vegetation clearance, lighting, new access and traffic. The adjacent allotments are core green infrastructure.	The allocation of this site is considered to be justified. This site is considered to meet the test of being surplus to requirements in terms of its sports function. The bowls club folded over 20 years ago due to lack of interest and there has not been recent use of the fenced off site. The Oxford City biodiversity surveys 2025 included this site and did not find there was likely to be biodiversity interest that would prevent development. The fronts Cowley Road, and a significant green buffer to the historic buildings of Bartlemas would remain in the allotments.	None.

The landowner considers the site is unlikely to be capable of accommodating 10 dwellings, due to constraints such as it being in the conservation area and the presence of trees and hedges and need for qualitative improvements to GI. This reduces the developable area considerably from 0.3ha and is as low as 0.15ha. A flatted development is at odds with the surrounding character.	The Site Capacity Assessment sets out how the minimum capacity for this site was determined. This considers the constraints and features that should influence design and concludes in summary: The minimum capacity for the site has been calculated with the following assumptions: • Imitation of the block size to the east of the site, thereby tying into the Bartlemas Conservation Area within which the site sits (approx. 35dph). • Taking into account protected green infrastructure and areas at risk of surface water flooding in the developable site size. The capacity assumed is low and reflective of the characteristics of the site and its setting. Immediately southeast of the site (the other side of Batlemas Close) is a substantial terrace of 2-2.5 storey homes. Even as houses, this terrace style frontage could be continued at provide at least 10 homes, leaving room for retention of green space. Therefore, 10 units seems very achievable as a minimum.	None.
Cowley has the least green space provision per capita in the city. Removal of yet more green space is unjustified.	It is unclear which study is being referred to. It should be noted that the site is within the St Clement's area of the 2022 Green Infrastructure Study. In terms of accessibility of green space, the study is concerned with distances to parks and accessible open space. This site is a fully enclosed and inaccessible private space.	

Sport England has made a representation relating to Policy SPE2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy SPE2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPE3: Government Buildings and Harcourt House

POLICY	SPE3
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE3				
All respondents **raising objections** on this policy/chapter	57.21	81.22	90.7	98.11	106.2
	89.29	138.56			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The two sites have remained vacant for many years, despite appearing in previous Local Plans and having high potential for redevelopment / housebuilding. A Compulsory Purchase Order should therefore be included in this policy; Policy E1 must be less restrictive to allow this.	The landowner has confirmed their intentions to develop the site. A Compulsory Purchase Order is not considered necessary and is not within the control of the Local Plan.	None.

Historic England have made a representation relating to Policy SPE3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Natural England has made a representation relating to Policy SPE3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Taken individually, sound, but the points made elsewhere regarding cumulative impact of other site allocations in the vicinity apply.	Comment on taking into account cumulative impacts of site allocations in the wider area has been addressed under the responses relating to the Marston Road and Old Road Area of Focus section of the consultation summary – refer to that section.	None
Support retention of uses set out under existing OLP2036 Policy SP16. Centre maintains aspiration to include commercial research and development use within site redevelopment.	The policy sets out that other complementary commercial uses will be considered on their merits.	None
Requirement for green space provision should be omitted as this is already addressed effectively in development management policies. Inspector of current Local Plan required removal of mandatory provision of on-site green space via site allocation policy.	Whilst the policy cross references to Policy G2, it then seeks to set out how the requirements could be achieved onsite. This is intended to be helpful to applicants in terms of what might be expected, but alternative approaches in order to meet the requirements of policy G2 would also be considered.	None.
Extensive, lengthy commentary lacks clarity and would be better expressed as supplementary guidance; this would also help differentiate between strict requirements and guidance.	The same structure is being followed across the site allocations. Whilst the criteria in the policy are more detailed in the absence of supporting text, this is generally because we have sought to include everything of relevance in the policy	None

	along with helpful guidance about how different requirements can be met.	
Oxfordshire County Council have made a representation relating to Policy SPE3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Ineffective, as no specific amount of public space is mentioned.	The policy cross references to Policy G2 which includes requirements for the provision of new public open space for residential and mixed-use sites.	None
Unjustified, as no mention of the need to preserve the seclusion of Headington Hill Park. Watching brief required for the end of northern part of Cuckoo Lane, on the old Oxford City boundary	The urban design and heritage section of the policy sets out various requirements in terms of mitigating impacts upon the setting of the heritage assets, which includes the Headington Hill Conservation Area. Reference is made to the protection of the Headington Hill view cone and to mitigating amenity impacts on the setting of the Park. The summary box flags a range of notable heritage assets that are of relevance to the allocation, this includes Cuckoo Lane. Applicants would also need to consider impacts on this in relation to Policy HD4 (non-designated heritage assets) as it is listed on the OHAR. We have identified that it would be useful to incorporate a cross-reference to Policy HD4 alongside HD3 and propose to put this forward as a modification.	**Modification proposed to add an additional policy cross ref to non-designated heritage assets policy under criterion g), as follows:** *g) Proposals must be designed to be sensitive to their impacts on the significance and setting of the nationally listed and locally listed heritage assets on site and adjacent to it, taking opportunities to enhance these wherever possible (**Policy HD3 and HD4**).*

Peat and fen surveys are required at the site.	The policy notes that a biodiversity survey will be required to assess the ecological value of the site. Nonetheless, Policy G6 states that where there is a reasonable likelihood of harm or loss to protected species or natural/semi-natural habitats, targeted ecological surveys must be undertaken prior to the determination of any planning application.	None
A natural calcareous stream flows into Harcourt House from Headington Hill Park with water across the path after rain.	It is unclear what site-specific requirement would need to be incorporated in response to this point. Nevertheless, there are policies in the Local Plan that deal with mitigating impacts on watercourses, and for dealing with surface water flood risk (set out in chapter 4 and 5 of the Local Plan).	None

Policy SPE4: Jesus College Sports Area

POLICY	SPE4
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE4			
All respondents **raising objections** on this policy/chapter	36.3	82.3	126.3	85.13
	71.1	90.15	138.57	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Policy SPE4 is unsound because it could result in the loss or reduction of an established cricket	Policy SPE4 sets out in paragraph a) that the site is identified as supporting green	None.

facility that is actively used and forms part of Oxford's limited sporting infrastructure. The Local Plan does not clearly demonstrate that the loss of the playing field would be acceptable or that an equivalent replacement facility could realistically be provided within the city. The reduced sports field would not be large enough to support cricket matches. The retained sports pavilion at Lincoln College is unlikely to be sufficiently large for hosting sports matches concurrently at Lincoln and Jesus College sports grounds. The allocation may also conflict with national planning policy which seeks to protect existing sports facilities unless they are demonstrably surplus to requirements or replaced with equivalent provision in an appropriate location. Given the constrained nature of Oxford and the difficulty of delivering new playing fields, the loss of this facility could reduce opportunities for cricket participation. Retaining some of the sports provision is not sufficient as it will not be adequate to service the needs of all at peak times, which invariably will mean residents can only use them at unpopular times. The policy should be amended to ensure that the existing cricket facility and playing field are	infrastructure, therefore, development on the allocation site would need to demonstrate compliance with Policy G1 paragraph a) which relates to proposals that impact on outdoor sports including pitches. Any harm/loss will need to be mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher. This approach is compliant with national policy. Policy SPE4 paragraph c) also provides some flexibility to consolidate sports provision with neighbouring sites but only where the same capacity to meet playing pitch needs can be demonstrated.	

retained unless an equivalent or better replacement cricket ground is delivered within Oxford prior to any loss of the existing facility. Also, Oxford City Council is requested to: 1. Protect existing cricket playing fields within the Local Plan framework. 2. Reconsider housing allocations that would result in the loss of operational cricket grounds unless appropriate replacement provision can be secured. 3. Work collaboratively with Oxfordshire Cricket, local clubs and Sport England to develop a long-term strategy for cricket facilities within the city. 4. Ensure that any development proposals affecting sports grounds provide replacement facilities that are: ● equivalent or better in quality ● accessible to existing users ● delivered prior to the loss of existing facilities.		
Natural England has made a representation relating to Policy SPE4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The allocated site would bring considerable, unnecessary, environmental damage to the local green infrastructure network and to the setting of Bartlemas Conservation Area and its associated heritage assets, also conflicting with Local Plan's own strategic policy S1 criteria f), g) and h). We are concerned about the cumulative	The site allocation policies SPE4 (Jesus College) and SPE7 (Lincoln College) have been carefully considered in relation to the historic setting and the potential cumulative impacts of development on these sites. This has resulted in carefully drawn site boundaries which provide a set back from the Bartlemas	None.

impact of development at these three sites on the character and special qualities of Bartlemas Conservation Area - which has already been adversely affected by development of student Housing at Sinnet Court on its north-west fringes some years ago. The Conservation Area represents a surviving fragment of Oxford's original farmed landscape setting. The Conservation Area Appraisal, describing the vulnerability of the Area, states that "The rural 'undeveloped' character of Bartlemas is paramount to the area's significance" and that "the historic elements of seclusion and isolation should be preserved and their characteristics enhanced".	Conservation Area and specific wording in relation to urban design and heritage.	
This allocation in its entirety is part of the protected G1B green infrastructure network therefore reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.	This requirement is set out in Policy G1 and in paragraphs a) and b) of Policy SPE4.	None.
Sport England has made a representation relating to Policy SPE4/SPE7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPE5: John Radcliffe Hospital

POLICY	**SPE5**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE5		
All respondents **raising objections** on this policy/chapter	105.9	109.1	138.59

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Amend criterion b) so that other suitable uses can have an operational and/or research link to hospital healthcare and education and not just operational and/or research link to this hospital.	The policy lists a number of uses linked to the hospital which we consider to be suitable and that the proposed amendment would be inappropriate.	None
Unsound as not justified - Policy notes the location of part of the site in the conservation area and suggests a masterplan should be available so that new developments and related issues such as green infrastructure and parking can be addressed in the context of the whole. We would support an initiative to produce such a plan. Propose that the 'Open space, nature, flood risk' section be expanded to include consideration for the conservation area. Also propose that 'i' and 'j' under the 'movement and access' section could introduce a requirement for a site wide transport plan, which should include a policy to minimise the impact of traffic on OHCA and to align with county policies to reduce overall traffic numbers.	The policy wording is not considered to require amendments. The text in the box preceding the policy makes reference to some trees being protected by their location within the Old Headington Conservation Area (OHCA); it is not necessary to refer to the OHCA again in the 'Open space, nature, flood risk' section. Point j. includes reference to both a transport assessment and travel plan. These should be submitted in support of any major development proposals and cover the whole site. Comments acknowledged on the site capacity assessment.	Capacity Assessment updated with correct site photo and correct street name references.

Further comments on inaccuracies in the Site Capacity Assessment.		
Unsound as not justified or effective – the policy has no goals or objectives and excludes the main issues of parking levels and flooding. Policy has no targets to reduce parking provision to enable a more efficient use of land or address the climate change, environment and public health issue created by the hospital. Flood mitigation is NOT sufficient, reduction must be enforced. Thames Water and the Environment Agency, to establish the appropriate drainage mitigation measures for any development. Heritage statements are factually incorrect. Amendments suggested to make policy sound relate to parking, green space, heritage and flood risk.	Comments noted. The policy wording is not considered to require amendments.	None

Policy SPE6: Land Surrounding St Clement's Church

POLICY	**SPE6**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPE6**		
All respondents **raising objections** on this policy/chapter	81.23	98.12	138.6

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**

Cumulative impacts and the need for coherent planning in the Marston Road should be considered. The road junction will be difficult on this congested point of the Marston Road and this will be worsened by cumulative impacts.	The scale of development expected, alongside the low level of parking expected by the parking standards (Policy C8) means that the site is not expected to cause significant traffic-generation. The site has been considered by Oxfordshire County Council, who have not raised highways concerns with the allocation. The policy carefully considers the most likely suitable access points.	None.
Care needs to be taken to avoid light-spill onto St Clement's Church at night; the illuminated church surrounded by dark woodland is a night-time features of the Marston Road. Harm should be avoided on ' Spires View' from South Parks.	The policy does refer to avoiding artificial light alongside the Cherwell and also by the church if it is found to support roosting bats. The policy notes the important heritage features that could be impacted by the development and requires design to respond carefully to these. The southern part of the site is in a view cone and this is noted. However, Historic England have also noted that the policy itself contains less detail about the heritage assets than some other policies.	Main Modification proposed to add more detail about heritage assets into the policy itself.
Adverse impact on the ecology of the Cherwell should be avoided. The site is too close to the floodplain of the Cherwell on the western side and cuts into the wildlife corridor of the Cherwell. Development should be avoided in FZ3a.	The policy says that habitats should be preserved and enhanced, with retention of trees and hedgerows where possible. The policy contains multiple criteria (a-i) relating to open space, nature and flood risk. The Policy acknowledges that: *'Part of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the*	None.

	suggested measures set out for this area. Refer to the LNRS mapping tool for further details.' In addition, a 10m buffer is required alongside the Cherwell. The area of flood risk is in the southwest part of the site, and the policy is clear that development should avoid this area.	
As the Marston SSSI is upstream of the site it is hard to understand how it could possibly affect it.	Because of the proximity to the SSSI and location immediately adjacent to the Cherwell this site is identified in the Source Pathway Receptor Analysis as having potential impacts on the SSSI. The New Marston Meadows SSSI is sensitive to changes in the flows and quality of water in the Cherwell due to being in its floodplain. It is not the case that a development can't have any upstream impacts on river flow.	None.
Historic England has made a representation relating to Policy SPE6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPE7: Lincoln College Sports Ground

POLICY	**SPE7**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPE7**		
All respondents **raising objections** on this policy/chapter	36.4	126.2	85.13
	82.4	102.5	138.58

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The allocation may also conflict with national planning policy which seeks to protect existing sports facilities unless they are demonstrably surplus to requirements or replaced with equivalent provision in an appropriate location. Given the constrained nature of Oxford and the difficulty of delivering new playing fields, the loss of this facility could reduce opportunities for cricket participation. Retaining some of the sports provision is not sufficient as it will not be adequate to service the needs of all at peak times, which invariably will mean residents can only use them at unpopular times. The policy should be amended to ensure that the existing cricket facility and playing field are retained unless an equivalent or better replacement cricket ground is delivered within Oxford prior to any loss of the existing facility. Also, Oxford City Council is requested to: 1. Protect existing cricket playing fields within the Local Plan framework. 2. Reconsider housing allocations that would result in the loss of operational cricket grounds unless appropriate replacement provision can be secured.	Policy SPE4 sets out in paragraph a) that the site is identified as supporting green infrastructure, therefore, development on the allocation site would need to demonstrate compliance with Policy G1 paragraph a) which relates to proposals that impact on outdoor sports including pitches. Any harm/loss will need to be mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher. This approach is compliant with national policy. Policy SPE4 paragraph c) also provides some flexibility to consolidate sports provision with neighbouring sites but only where the same capacity to meet playing pitch needs can be demonstrated.	None.

3. Work collaboratively with Oxfordshire Cricket, local clubs and Sport England to develop a long-term strategy for cricket facilities within the city. 4. Ensure that any development proposals affecting sports grounds provide replacement facilities that are: ● equivalent or better in quality ● accessible to existing users ● delivered prior to the loss of existing facilities.		
Lincoln College is surprised that the Council proposed to allocate just the eastern portion of the Sports Ground, via Policy SPE7. Ongoing pre-application discussions with the Local Planning Authority have included preliminary heritage research and assessment to inform this stage of the work and to provide appropriate context for the visual appraisal. This has included a review of the heritage significance of the adjacent Bartlemas Conservation Area, relevant listed and non-listed heritage assets, and their settings, together with an understanding of how the site currently relates to these assets. In short, the precise location of development within the allocation could be refined through the next stage of design, following more detailed analysis of townscape impact, heritage issues, access geometry and landscape relationships. The alternative red line proposed	Following discussions with the College, amendments have been agreed in the Statement of Common Ground (SoCG) in Appendix 1 – Statements of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

in the pre-application submission therefore encompasses the area within which development could reasonably be accommodated whilst allowing the final siting to respond to the key considerations.		
Sport England has made a representation relating to Policy SPE7/SPE4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPE8: Manzil Way Resource Centre

POLICY	**SPE8**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPE8**				
All respondents **raising objections** on this policy/chapter	111.2	138.61			

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
Oxford Health NHS Foundation Trust has made a representation relating to Policy SPE8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Policy is unsound as it not justified. The phrase “Could be car free” should be changed to “must be car free”.	This phrase does not appear in either Policy SPE8 or its supporting text.	None

Policy SPE9: Marston Paddock Extension

POLICY	SPE9
All respondents **supporting** policy	No representations were received in support of this policy.

POLICY	SPE9	
All respondents **raising objections** on this policy/chapter	4.1	42.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Development is in a conservation area with many houses of historical interest. Access to the proposed site is limited and only possible by driving down narrow lanes in close proximity to houses and the church. Old Marston Village is already a poorly managed 'rat run' for commuters and school traffic with no efforts made by the council to limit volume or speed. Traffic has significantly increased in the village since the introduction of the congestion charge. Recent housing developments did not put any measures in place to manage this, so it's assumed this will be similar. Mill Lane building works have been disruptive and damaging to local roads, verges, pavements and houses. The current infrastructure of the village continues to be damaged to builders can make a profit.	Some of these comments relate to County Council transport measures outside the remit of the planning. The County Council as highways authority has reviewed all potential site allocations and had no in principle objections to the allocation of this site for 20 homes, and has not made a representation about it. The potential for access has been established by the development to the north, now completed and functioning successfully. Policies C6-C8 of the Plan ensure necessary transport-related measures are put in place and manage parking levels.	None.

Lucy Developments Ltd has an option on the site and is promoting the site for a minimum of 20 new family homes. Lucy Developments Ltd largely agree with the wording and provisions of Policy SPE9 but the point of contention is the red line area of the site. The draft allocation seeks to deliver a minimum of 20 homes on the 0.51ha site. To delivery a scheme that meets the policy criteria relating to BNG, green links, amenity green space and so on, will require use of the entire site in the control of Lucy Developments Ltd. The illustrative masterplan shows the area most appropriate for residential development, which is 0.53ha, which would provide 18-20 units at 34-38dph. The north-east section of the site, closes to the A40, is indicatively deemed most suitable for open green space and supporting blue infrastructure.	The larger site area in the control of Lucy Developments Ltd was put forward at the start of the OLP45 Plan-making cycle, and the City Council understood the intention was to bring forward 20 homes on the area of grey belt. The indicative masterplan does show some development beyond what is considered to be PDL/grey belt. The area to the east of the built-out Marston Paddock development and south of the A40 was shown on the indicative masterplan as for use for GI enhancement/an attenuation pond only. None of what was proposed for that area of land would need an allocation policy. All use for BNG enhancement required as a result of development or for SuDS and so on could take place without this area being within the allocation. Given that Lucy Developments Ltd seemed to have no intention of developing on this area, it was not included in the allocation. This seemed the most sensible approach, because the work that would need to be done to assess that area of the ownership for an allocation would be considerable and there are potential issues that would make it unsuitable, for example access and the increased amount of traffic that would be generated, and the currently unknown biodiversity interest. Furthermore, the whole site would need to be removed from Green Belt, but a potential 20 dwelling development would not justify removal of such a large area of Green Belt. The	None.

	Reg19 representation from Lucy Developments Ltd now says that this space is 'indicatively deemed most suitable for open green space and supporting blue infrastructure', which suggests that, if the red line were extended, this would be taken as showing the whole site could be developed, when at this point the wider site has not been properly considered for its suitability. The approach the City Council took was to allocate only the area of PDL it considers to be grey belt, which is the area it understood to be intended for development, and which is large enough to accommodate a minimum of 20 homes at less than 40dph, which is considerably less than the 50dph on the site to the north and which would seem appropriate to the site context. To allocate a larger site for development than seems necessary in order to achieve the development of the intended number of dwellings would not be justified, especially as that would involve removing more land from the Green Belt, and land which is not grey belt.	
Lucy Developments Ltd understands the City Council's intention to make an exceptional circumstances case, but does not consider this to be necessary as the land is considered to be grey belt. The site forms only part of the assessed Green Belt parcel 114(a). The majority of this parcel is open and development, but the site is mainly PDL and fundamentally not	It is necessary for an exceptional circumstances case to be made to remove land from the Green Belt during the plan-making process, in order that in can be allocated for development, even if the land is grey belt. All Green Belt parcels or sites put forward in the Green Belt were considered for development as part of the plan-making	None.

‘pastoral field and woodland’. The Green belt report assessed potential moderate-high harm to the Green Belt purposes if the site were to be removed. This negative assessment is considered to be in relation to parts of the parcel outside of the control of Lucy Developments Ltd.	process, regardless of whether they are grey belt or not, and regardless of how strongly they performed against the Green Belt purposes. However, the vast majority of Green Belt within Oxford is not developable for three main reasons (or a combination of the three), either it is functional floodplain, nationally protected for biodiversity interest or there is not landowner interest in developing the site. There were also found to be some other site-specific reasons that sites were not suitable, in most cases involving access. The majority of parcel 114(a) has a landowner not interested in development. Of the part in the control of Lucy Development Ltd, the reasons for not suggesting a site allocation across the whole ownership are not related to the Green Belt function or assessment, but are the reasons set out in the response above.	
We largely agree with the policy considerations and physical/environmental considerations as set out in the SHLAA but query the extent to which the site supports the function of the GI network, with its strong connection with urban form to the north, south and west and its proximity to the A40. It is not part of a wider green network, is of relatively low environmental quality and is not accessible by the public.	The site has not been assessed as being part of the core GI network, but the site does have some green infrastructure interest.	None.

Policy SPE10: Nuffield Orthopaedic Centre

POLICY	SPE10
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE10
All respondents **raising objections** on this policy/chapter	138.62

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Policy is unsound as is not justified - It's not clear why employer-led development is not included. Peat reserves must be protected. The "Impact risk zone" of the Lye Valley is a computer generated radius and is not relevant, the ground and surface water catchments, are. The phrase "Consolidate parking" is ineffective as it is meaningless, a reduction is required. High probability of roman potteries and medieval activity on Old Road.	Policy does not include any reference to residential development. It acknowledges the recorded peat reserves requiring these to be protected and any harm to them mitigated. It also acknowledges that any development could impact on surface and ground water conditions, requiring compliance with Policy G6. The supporting text acknowledges the area's potential for archaeological interest.	None

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Policy SPE11: Oxford Brookes Marston Road Campus

POLICY	SPE11
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPE11

All respondents **raising objections** on this policy/chapter	81.24	98.13
	103.1	105.16

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The School buildings are recognised as an Oxford Heritage Asset, and the retention of the building as a significant historic feature of the Marston Road is regarded as essential. However, demolition is envisaged as a possibility in the plan, and this is not considered acceptable. There is a suggestion that the land within the internal quad might be preserved as a Local Wildlife Site if the former School and the quad itself were to be demolished around it. Although that would be better than nothing, it raises the question as to whether the wildlife habitat formed by the quad would survive the quad's demolition; that seems an unsound assumption.	The allocation policy requires that design proposals acknowledge the significance of the historic Milham Ford School buildings and the plan (Policy R2) requires that applicants demonstrate that re-use of any existing buildings on a site has been explored and robustly demonstrated to be unfeasible before resorting to demolition. The internal quad is already designated as a Local Wildlife Site, and there are requirements in the plan (policy G6) to mitigate the potential impacts of development.	None
The building has not been Milham Ford School for 23 years now and the Quad was never part of the grounds but within the building which is now 'Oxford Brookes Marston Road Campus'	The references in the policy to the Milham Ford School apply to the historic name of the main building and is clearly stated as such. The location of the Quad in relation to the building is also clearly stated.	None.
Historic England has made a representation relating to Policy SPE11, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Amend policy wording as follows: • Remove criterion (h); • Refer to treeline in criterion (d) as 'mature' rather than 'established'; • Change wording around number of units required.	Criterion (h) is consistent with the approach of the plan. Policy R2) requires that applicants demonstrate that re-use of any existing buildings on a site has been explored and robustly demonstrated to be unfeasible before resorting to demolition. As the internal quad is designated as a Local Wildlife Site, there are requirements in the plan (policy G6) to mitigate the potential impacts of development. Criterion (d) is suitability worded as part of a description of the existing condition of the site and the suggestions are not considered necessary to make the plan sound. The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is suitable for the setting. The policy wording is clear that it is a minimum requirement.	None

Policy SPE12: Rectory Centre

POLICY	SPE12
All respondents **supporting** policy	No representations were received in support of this policy.

POLICY	SPE12
All respondents **raising objections** on this policy/chapter	111.2

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxford Health NHS Trust has made a representation relating to Policy SPE12, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPE13: Ruskin Campus

POLICY	SPE13
All respondents **supporting** policy	No representations were received in support of this policy.

POLICY	SPE13		
All respondents **raising objections** on this policy/chapter	103.3	109.2	138.3

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The policy is ineffective as it assumes one big development. This would not apply to say, a moderate extension to an existing building. It is unclear if residential development must be linked to academic uses.	There are a number of sites that have policies that will apply to development that comes forward over time and if a modest development is proposed then it may be that only certain aspects of the policy are relevant. It is unlikely that residential development not linked to the academic use would be feasible within the campus, but the policy does not rule that out in case it does come forward.	None.

The planning application that was approved in 2022 was for the demolition and provision of new student accommodation. This- like the fate of many previous applications for the same site for similar work- will expire in June of this year. Submissions to the OLP2040 examination from Quod on behalf of UWL showed student accommodation would be a minor component of new development on the site and suggested the campus site could be used for non-educational 'enterprise' purposes. In 2024 and subsequently, Ruskin has advertised office accommodation in Smith House	Work has commenced on the 2022 application, so it has not expired. The policy can't prevent buildings being used for their lawful use by an occupier other than the university. The Planning system cannot take account of who an owner or occupier is.	None.
Just south of the red line I've seen a flowing spring, marsh plants and peat development. How will campus development not interrupt this flow and keep it unpolluted. The zone between SPE13 and SPE14 is suggested for biodiversity enhancements. Enhancement would mean making a really wet fen habitat to reinstate what would have been there before damaging drainage. Public access would need to be restricted due to wetness. A wetland without public access sandwiched between two developed areas seems unlikely to survive or be much appreciated. It would need a wide buffer and good green connectivity.	Development proposals on both sites will need to delivery biodiversity net gain. Keeping green connectivity through the sites and important existing green features is important, as is noted in both policies. Criterion e) of Policy SPE13 says *'Due to the site's proximity to recorded peat reserves associated with Dunstan Park, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (Policy R6). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.'*	None.

Policy SPE14: Ruskin Field

POLICY	SPE14
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE14				
All respondents **raising objections** on this policy/chapter	6.1	8.1	9.1	10.1	11.1
	18.1	19.1	20.1	21.1	22.1
	24.1	25.1	26.1	28.1	29.1
	33.1	34.1	35.1	37.1	38.1
	39.1	41.1	44.1	45.1	54.1
	55.1	62.1	68.1	72.1	73.1
	74.1	75.1	76.1	103.4	109.3
	120.2	121.1	138.2	139.18	146.1
	149.1	150.1	155.1	156.1	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Not legally compliant: Council will financially benefit from the sale of Council-owned land for access, in effect seeking to grant itself planning permission. The greater the number of houses, the greater the financial benefit. Also risk of Council ignoring an increasing amount of damage to the natural and historic environment in order to further the gain. At least this is a flagrant conflict of interest and	At a meeting on Cabinet approved the Heads of Terms for an Option Agreement for the disposal of land at Foxwell Drive, noting that any development was subject to planning. At the meeting it was noted that the option agreement would mean that if any relevant development gained permission the Council could then grant necessary access to land. It was noted that that meeting was not the place to discuss whether or not development on this land	None.

at worst, total misuse of power, bordering on the illegal. This situation must result in potential for judicial challenge. The fact that the Council has purchased an access route does not suddenly make what was wrong in the first place right. Policy can only be sound by removing the site allocation/policy can only be made sound by removing the option facility/planning decisions must be made by a different planning authority.	would be good or bad, as that would be tested through the planning process. The local plan will need to consider sites owned by the City Council (although this site is not, the developer has been granted an option to use City Council land to gain access. This local plan process happens independently of City Council property considerations).	
The policy wording emphasis is on the environmental considerations, yet the policy seems ultimately to advocate development. There are huge housing developments over at Bayswater and Barton that can happily satisfy the housing need in this part of Oxford. Given the considerable quantity of new housing at these nearby sites it would be an act of environmental vandalism to build on a small, sensitive site of such importance.	Housing need is calculated by local authority area, and if there is no capacity in that area then agreements must be made with neighbouring authorities about the 'unmet need'. Developments on the edge of Oxford will be partly to meet Oxford's unmet need, but also help to meet those authorities' own housing needs. When exporting need, every effort must first be made to identify potential housing capacity with Oxford.	None.
Siting development here will harm existing neighbouring uses; would impact on Dunstan Park and the children's play area in terms of noise, pollution and air quality. development would negatively a tiny forest;	Whilst the potential impacts on local amenity will be considered as part of an application with detailed proposals, there is not considered to be an intrinsic level of harm in principle that would be caused by development of housing on this site.	None.
Access roads (Old High Street and in Marston) are not sufficient to service this amount of new build – emergency vehicles in particular are hindered by existing traffic levels. Traffic congestion at the pinch points in Old Headington and Northway is a huge problem.	There are good sustainable travel links from the site. The X3 runs along Foxwell Drive into Oxford city centre every 20 minutes during the day and it runs early to late including on Sundays. There is potential for development here largely served by sustainable travel means. Any detailed application	None.

Given the council's efforts to reduce traffic around Oxford, so it would be illogical for the council to allow housing to be built on this site, which would obviously increase pressure on the already overloaded road system. Having access from Foxwell Drive would impact Copse Lane, Dunstan Road, St Andrews Road, and Ambleside Drive and Saxon Way - roads that are already overloaded at peak hours. New bus services would not significantly reduce traffic. The area does not have opportunities for sustainable travel links/public transport in the area is poor. It's a long walk to frequent services on the London Road. This will give rise to an increase in the number of cars.	would need to demonstrate the there are minimal transport impacts or that these can be limited. However, in principle it is considered that housing development on this site that is acceptable in transport terms is certainly possible.	
An access to the A40 at Foxwell Drive would be dangerous. There would be pressure to create links from the site to the A40.	A new access road to the ring road would be highly unlikely to be approved by the Highway Authority and is not suggested in the site allocation policy, assumed, or necessary for the development.	None.
New owners would use Stoke Place to park their cars, adding to an already difficult situation.	Parking provisions will need to be considered carefully as part of any detailed proposal and application, and the policies of the plan require consideration of transport impacts. Stoke Place becomes a bridleway at the north end, alongside the site, and does not have good connectivity with the site.	None.
Upgrading Stoke Place/ cycle path to ring road to make it more attractive for cycles, walking, mobility scooters and provide a link into the site from this route and retain some areas as park/ trees for communities to enjoy.	Criterion o) of the policy says: Stoke Place is not suitable for providing vehicular access, but access to it for walkers, cyclists and wheelers should be considered in order to ensure permeability.	None.

Existing infrastructure such as schools and drainage are also likely to be overloaded.	The Infrastructure Delivery Plan assesses the need for infrastructure arising from anticipated growth in Oxford. There is not anticipated to be an increase in need for school places that can't be met.	None.
Any development would represent a considerable threat to wildlife, water courses and vegetation. Any development would be on greenfield which would have negative impact on an important green infrastructure network. This doesn't comply with the need to enhance biodiversity and facilitate wildlife movement. Development will disrupt the wildlife corridor that runs from Barton triangle to Dunstan Park. The green fields provide a crucial contribution to the character of the unusual village setting within the ring road and provide a link for wildlife between Dunstan Park to the west and the Oxford Preservation Trust land to the east. Development here would undermine the environmental value and special character of the area. It would destroy the character of a much loved and enjoyed part of the city. The council surely has a duty to preserve and enhance such an asset.	The site allocation includes the northern part of the fields only, leaving the southern part, where there is a pond, to remain as a wildlife corridor from west to east. The site is not accessible to the public and is not part of the core Local Nature Recovery Network (which would not itself preclude development anyway). However, as noted in the information box above Policy SPE14, there are protected species potentially present and using the habitats including commuting bats, breeding birds, reptiles, amphibians and invertebrates. The policy responds to the likely ecological value of the site, which is likely to be focused on trees and hedgerows. Criterion a says '...*trees and hedgerows at the boundaries of the site and running through the site should be retained as far as possible, and opportunities taken for enhancement.'* Criterion b says *'New native hedge and tree planting should connect existing trees and hedgerows.'*	None.
Policy can be made sound by ensuring housing is not approved in areas that flood, upgrades to the sewerage system or keeping residential numbers low so as not to adversely impact sewage capacity	The site is in Flood Zone 1 and does not have significant areas of surface water flooding either. These occur only along the drainage course through the middle of the site and in the north parallel to the A40.	None.
Old Headington used to have 'protected open space' which strictly limited building. The	Policy SPE14, in criterion a, is clear that *'The green character of the site is important to the setting of*	None.

green belt no longer exists and allocation of the site would further diminish the remaining green areas. Development would not take account of the local historical context and respond to the heritage significance of the conservation area; would not be in accordance with para 20.d and para 202 of the NPPF (conserving and enhancing the natural, built and historic environment including landscapes and GI and protecting heritage assets). Development would significantly harm the setting of the Old Headington Conservation Area. It would completely alter the character and appearance of the wider Conservation Area and would affect views towards Old Headington from the Elsfield View Cone, the importance of which is specifically referenced in the Assessment of the Oxford Views Cones 2015. The loss of three green fields at the heart of the band of fields that run from Dunstan Park to Barton Lane, framing the village at its northern edge, would cause substantial damage to a designated heritage asset, stripping it of one of the features that give the conservation area its special character. In terms of balancing benefits it is not credible that any advantages gained by building 28 houses could outweigh the consequent environmental degradation.	*the Old Headington Conservation Area'.* However, there is considered potential for carefully designed development, which would have to be of low height and density, and most importantly retain green infrastructure and green corridors. The criterion g says: '*Significant green features should be incorporated to retain the function of the site as one of the few vestiges of the rural character of the conservation area, important to its setting and understanding history.'* The site is not within a view cone, but there is potential for it to impact views from the Elsfield View Cone. For this reason, criterion h) says that '*Buildings should be carefully placed to retain important views across the site and visual links with rural hills beyond...'* The Green Belt does still exist, but this site is not in the Green Belt. Old Headington Conservation Area ensures development is considered in terms of its impact on the identified special character of the area, and must respond to it.	
Support identification of Ruskin Field as proposed allocation but consider some of the	The land owner's suggestion that the whole field should be allocated for development is responded	None.

policy requirements are not adequately justified and the policy could be made more effective to deliver the Promoter's identified capacity of at least 130 dwellings. Have indicated the Policies Map and red line area in the allocation do not include the proposed access via Foxwell Drive and requested these are both amended to include the land for this access. Also disagree with the requirements in criterion 'd', 'h', 'i', 'j' and 'k' of the policy suggesting amendments to each of these.	to in the section about omission sites. There is not considered to be a need to extend the site boundary to include all of the area that would need to be included in works to provide an access for Foxhall Drive. Detailed proposals for this site will require careful consideration of all the points listed in the policy in order to be successful. The policy sets out how considerations relating to the generic policies of the plan are likely to be relevant, and gives indications about how development proposals will need to respond to known features and characteristics of the site. No modifications are proposed.	
Around the northern side of Headington Hill there are a number of small spring or seepage alkaline calcareous fen sites fed by the Headington Limestone and with significant peat formation, more are being discovered. SPE14 is likely to have some accumulated peat deposits present and is therefore unsuitable for any development. It would be better restored to a more biodiverse wetland. Ruskin Field contains fen valley habitats and abuts Larkins Lane Field and Dunstan Park, both ecologically rich sites and the subjects of ongoing spring fed calcareous fen (valley fen) restoration projects. The development of Ruskin Field would pose a severe threat to these rare habitats and would cause significant harm to the peat deposits contained underneath them. The adjoining fields between this site and Dunstan Park also contain evidence of these habitats.	Botanical survey notes from surveys carried out in 2017 show that the northern fields, i.e. those in SPE14 are largely semi-improved neutral grassland. The site currently allocated in the Oxford Local Plan 2036 includes a pond, an area of hard rushes, an orchard and secondary broadleaved woodland. These areas are not proposed for allocation in the Oxford Local Plan 2045. There are known peat deposits on Dunstan Park, but there are not known peat deposits on Ruskin Field. Policy R6 requires that: *'Proposals for new major developments on undeveloped land upon, or within 200m of, known peat reserves should submit an assessment, informed by borehole sampling, to allow the City Council to determine any potential impacts on reserves....".* Policy R6 would apply to Ruskin Field, so development could not take place without understanding of any potential impacts on the peat reserves. All of the site is over 100m from the known peat reserves. The following shows the	None.

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The fields support an unusual array of ferns and sedges which thrive as there are important peat deposits - particularly in the line of the proposed access road. These nationally important peat deposits require a wide area of green land to survive - they would disappear for good if this development goes ahead.	buffers at 50m, 100m and 150m from peat deposits at Dunstan Park. Criterion f of SPE14 says: '*Due to the site's proximity to recorded peat reserves associated with Dunstan Park, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (Policy R6). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.'* Detailed biodiversity and habitat surveys will be required as part of any application, and biodiversity impacts will need to be mitigated.	

Surprised that the allocation policy does not refer to the neighbouring site (SPE13: Ruskin Campus), as the cumulative effect of both site allocations should be considered together.	The Ruskin Campus site (SPE13) is an already built-up site where intensification is proposed and likely to continue over time (permission is already granted for some development within the campus). This will happen independently of any development on the Ruskin Field site.	None.
The proposed policy fails to take into account the reasonable alternatives and is not based on proportionate evidence and is therefore not justified.	At Regulation 18 stage, various options for the plan's approach were considered, as set out in the SA and supporting background papers. In terms of site allocations, the starting point for identified sites is that they should be allocated unless there are insurmountable factors that are likely to prevent development. Uses are in accordance with landowner intentions where these are compliant with the Plan strategy.	None.
The site should not be allocated for housing. Reference should also be made to include policy plans to establish: the number of houses being proposed, the mix of houses, the traffic impact onto the Foxwell Drive immediate area, the increased traffic impact through and to Old Headington, the visual damage to the green setting of Old Headington conservation area.	Much of this describes the details that would be required alongside a detailed planning application submission.	None.
The landowner has made an extensive and wide ranging representation (ref 156.1) The basis of this representation is the assertion that the site allocation policies are heavily constraints based, overly detailed, repetitive of other policies and set out matters that would be more appropriate to pre-application discussions and management	It is a helpful approach for the site allocation policy to apply the generic policies of the plan to the site, setting out some of the considerations that are relevant and indicating how those issues may be overcome. The contribution of this site to the special character of the conservation area is something that will need to be addressed through any detailed design, and it is appropriate for the allocation policy to give some direction to how this	None.

through the development management process. Examples include The overstatement of the contribution of the site to the character of the Old Headington Conservation Area and the assertion that the development could have an impact from the Elsfield View Cone, even though none of the site is in the view cone. The site's previous contribution as a transition to open countryside has been substantially changed by the construction of the bypass and by the development of Parton Park. Therefore, the policy should more positively recognise the site as a significant and unique opportunity to meet housing need in a sustainable location.	may be done, and what may be expected in an application. It is not overly prescriptive, and scope is given for a creative design response, but the policy includes some fundamental expectations, which relate to the generic policies of the plan and apply them. Views to, from and within the site will be important to consider in terms of how development may impact on their character.	

Policy SPE15: Slade House

POLICY	SPE15
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE15	
All respondents **raising objections** on this policy/chapter	111.1	138.63

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

Oxford Health NHS Foundation Trust has made a representation relating to Policy SPE8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Policy is unsound as not justified - Site has excessive surface level onsite parking, and important green space that should be preserved. Footpath connecting Horspath Driftway to the ringroad appears to be blocked by householders and should be reopened. There is no statement on how extra staff will be managed. Greenfield runoff rates must be achieved. Green spaces must be marked on Policy Map and preserved.	Site allocations can feature specific thematic issues that are covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.	None

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Policy SPE16: Thornhill Park (phase 2)

POLICY	SPE16
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE16
All respondents **raising objections** on this policy/chapter	85.14

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Sport England have made a representation relating to SPE16, which is summarised and	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

responded to in the Statement of Common Ground.		

Policy SPE17: Union Street Car Park

POLICY	SPE17
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPE17	
All respondents **raising objections** on this policy/chapter	81.25	138.64

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy SPE17, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The reduction of the car park seems difficult to achieve without a severe economic impact as it is normally at or near capacity, therefore contrary to Policy C2, Maintaining Vibrant Centres, no rationale given for allocation, therefore is unjustified further it is ineffective as it relies on a future determination.	The site is being considered for inclusion in the plan as an allocation because of developer interest in delivering residential units, and the sustainable location in the district centre. It will be a requirement in the policy that any development retains car parking on site at a sufficient level – as determined by relevant officers in the City Council - to support the district centre.	None required.

Policy SPE18: Warneford Hospital

POLICY	SPE18
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE18			
All respondents **raising objections** on this policy/chapter	90.14	108.1	85.15	138.65

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Natural England has made a representation relating to Policy SPE18, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The approach with the Warneford policy descends to a level of detail which is both selective and unnecessary. It is not succinct; is not positively prepared; has not been shaped by effective engagement with stakeholders; and does not avoid unnecessary duplication of policies.	The comments against the particular issues summarised in the rest of this table respond to this overarching point.	No further change proposed.
Policy does not start with a clear explanation of its purpose or of the important background to the site. It should be apparent on the face of the policy that the existing hospital and its	The introduction to Chapter 8 sets out the purpose of the policies that follow on from it. Each site allocation then follows the same general structure. By including the site as an	No further change proposed.

outbuildings are in urgent need of refurbishment or redevelopment, that a new hospital is needed and that the comprehensive development of the site can achieve major benefits, which are directly consistent with the stated objectives of the Plan.	allocation, the Local Plan is identifying it as an opportunity for development. In various parts of the policy, opportunities are identified, including under criterion g) that *redevelopment of the site offers a valuable opportunity to enhance mental healthcare provision and associated research.*	
Not necessary for the site allocation policy to repeat or summarise the requirements of other local plan polices, particularly concerned that, where other policies are referenced, they are given with a partial summary or reinvention of those policies. If reference to other policies is necessary, a model approach is the current adopted policy.	As set out in the intro to chapter 8, the detail relating to other cross-referenced policies within the site allocations is intended to give detailed guidance to apply the policies of the plan to the site allocations. They are generally referenced where there are particular site-specific considerations and include examples for how applicants could meet the policy requirements. We have followed the same approach across all of the allocations.	No further change proposed.
New draft policy SP18 is 1,057 words compared with the combined total of 535 words in the existing Plan for the policy and the supporting text of SP22. Policy is not succinct and the approach is not proportionate.	The rationale for the additional guidance provided for in the policy is set out above. Whilst the policy may be longer, we do not agree that this means it is not succinct or proportionate.	No further change proposed.
The draft SP18 is negatively expressed and heavily constraints based. By contrast, the existing Policy SP22 recognises the need for planned change, including the need to construct a new hospital on the site of the former playing field (inevitably resulting in a loss of open character compared with today but consistent with, rather than contrary to policy).	It should be noted that criterion a) of the policy clearly identifies that t*he loss of the former sports facility is considered justified only due to the need for and benefits of new hospital development.* In relation to the topic of constraints, as with all the allocations, we have sought to ensure that the key considerations of relevance to the design process in the context of the site are clearly set out. Omitting these from the policy	No further change proposed.

	would not mean that these considerations are not of relevance. Wherever possible, we have then sought to set out examples of how we think design could be tailored to respond to these points, which is intended to provide further clarity to applicants as to what might be expected. Of course, these may not be the only way to respond to these topics.	
The site is not currently designated as Supporting Green Infrastructure and that proposed designation should be removed from the site allocation.	The designation of core and supporting green spaces is new for this Local Plan as part of Policy G1. As G1 sets out, supporting spaces are *designated for their important role in enhancing the* (green infrastructure) *network and its overall function.* Our assessment of the green spaces on the site indicates that they can clearly be seen to be meeting a role in supporting and enhancing the function of the wider network in the area, and as such, they meet the criteria for being identified as supporting green spaces. Nevertheless, the designation does not prevent development, it simply seeks to ensure that harm/loss to these spaces is resisted unless this can be mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher.	No further change proposed.
Wording in current adopted policy, "… development of 3-4 storeys is likely to be appropriate… ", is absent from LP2045 version. This wording has proven to be not only correct (and supported by the design review process), it has also assisted in the public understanding that this site is suitable for buildings of some	The wording of criterion h) simply requires that applicants demonstrate that buildings are of an appropriate height, scale and massing when considering the wider context of the site. It does not preclude development of 3-4 storeys. It also allows for flexibility to respond to	No further change proposed.

scale. Again, the Regulation 19 wording (stating that new buildings should be of an appropriate height, scale and massing that responds to wider context) is neither helpful nor positively worded.	changing context of the wider area over the Local Plan's lifetime.	
Sport England have made representations against policy SPE18, these are addressed through the Statement of Common	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Planning permission is already in progress – See comments made against other policies (Churchill; Policy H5; R4 - (in relation to Parking), G1-G9, and Lye Valley).	No further response, comments on separate policies dealt with through the applicable sections elsewhere in the consultation statement.	No further change proposed.

Policy NCCAOF: University Area North of the City Centre Area of Focus

No representations received against this policy.

Policy WEBRAOF: West End and Botley Road Area of Focus

POLICY	WEBRAOF
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	WEBRAOF				
All respondents **raising objections** on this policy/chapter	40.9	88.3	88.7	115.7	134.10
	138.7	139.19	159.14		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

The approach to identifying the West End and Botley Road Area of Focus is positive. It is welcomed that the Local Plan notes the opportunity for Botley Road Retail Park to provide a contribution to Oxfords employment needs. The Botley Road Retail Park Supplementary Planning Document (SPD) already provides clear and robust guidance to support the site's coordinated regeneration. The SPD sets a strong framework to guide development in a manner that is integrated, sustainable, and responsive to the local area. Draft Policy S2 states that proposals shall align with design principles in SPDs such as the Botley Road Retail Park DB and that the Council shall be proactive in producing additional local design codes when a need arises involving the local community and landowners who wish to produce design guidance for their areas. In our view, given that there is already a Development Brief for Botley Road Retail Park, the introduction of further planning policy layers or site-specific design codes for Botley Road is unnecessary and risks creating duplication of policy and delaying emerging applications due to confusion around the correct development parameters. Any further codification through design codes or prescriptive policy would risk limiting the flexibility needed to respond to market	General comment noted. The City Council has not produced a Supplementary Planning Document (SPD) for the Botley Road Retail Park. Rather, a Technical Advice Note (TAN) in the form of a Design Brief, was produced to help guide the known potential redevelopment opportunities at the Botley Road in the absence of a formal policy framework. Draft Policy S2 states: *For Areas of Focus, the City Centre and District Centres, and other areas with more detailed guidance, proposals should refer to and align with the design principles set out in the Local Plan or in supporting documents such as SPDs and development briefs. The City Council will be proactive in producing additional local design codes or guidance when a need arises with the involvement of the local community, landowners and other stakeholders, and will support neighbourhood planning groups who wish to produce design guidance for their areas.* It is important that Policy S2 and Policy HD1, as strategic policies, provide, through Appendix 1.1, a consistent and comprehensive approach to ensuring high quality design of	No change proposed

conditions, innovative design approaches, or evolving employment needs.	developments. Given that the Botley Road Retail Park Design Brief TAN already exists, Policy S2 ensures that the principles already established through the Botley Road Retail Park Design Brief TAN are incorporated into the associated design checklist. The second part of the section quoted from Policy S2 (above) relates to the production of "additional design codes when a need arises". It is important to future proof this policy as not every part of the city benefits from locally specific design guidance.	
Network Rail has made a representation relating to Policy WEBRAOF, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The BOB ICB (now NHS Thames Valley) has made a representation relating to Policy WEBRAOF, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The following modification to Bullet point e) of Policy WEBRAOF is proposed: *e) Good quality urban design and place making including appropriate building heights for their setting ~~that do not negatively impact on key views or historic skylines~~.* This modification is suggested because the change to a view / skyline cannot in itself automatically be considered a negative impact. Given that wherever buildings are proposed over 15 metres, they should be accompanied by a visual impact assessment, which is required to	We do not accept the proposed modification to bullet point e). The policy does not in fact suggest that a change to the key views or the historic skylines would be automatically considered a negative impact. But rather, it qualifies the importance of delivering appropriate building heights for their setting. This policy is positively framed and sets out the conditions where planning permission would be granted. The policy is	No change proposed.

show how the proposal relates to Oxford's historic skyline/views and how it has had regard to the High Buildings TAN, it is considered that the words 'that do not negatively impact on key views or historic skyline' can be removed from the Policy, as this process is already captured via the High Buildings TAN.	seeking to "ensure that opportunities are taken to deliver... ...e) Good quality urban design and place making..." As a locationally specific policy, it highlights some of the specific elements of the area. The policy then and qualifies the type of impact that is acceptable, (i.e. ...*appropriate building heights for their setting that do not negatively impact on key views or historic skylines.").* This does not automatically mean that any change to the skyline is a negative impact.	
The policy does not address flooding although historically this area has flooded repeatedly. It is foolish to build to develop here. SUDS cannot work if less than one metre above the highest water table point.	Other policies in the plan specifically address flood risk and SuDS.	No change proposed
Development within the West End and the Botley Road needs very careful management to prevent harm to the: • views towards the western hills from the city centre, • views from the western hills towards the historic city centre. These are highly sensitive locations within some of the key historic defensive views out from St George's Tower to the west and from Raleigh Park, Harcourt Hill and Boars Hill looking towards the city. The policy should specifically refer to this, to ensure that new buildings are limited to appropriate heights.	Other policies in the plan (including Policies HD6 and relevant site allocations) already set out planning policy in relation to views and building heights. As the plan should be read as a whole, there is no need to repeat local policy requirements which is more accurately articulated elsewhere in the plan.	No change proposed.

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The Oxford Growth Commission (OGC) Interim Report (December 2025) identifies an opportunity area that includes the western part of the city centre and Osney Mead. Annex B of the OGC Interim Report describes the area as presenting "opportunities for transformational economic growth and residential development in and near to Oxford city centre." And that there are "Significant opportunities for redevelopment of brownfield sites in a sustainable location close to Oxford City Centre, Oxford Station and existing employment sites". This area of focus it should be extended to include the land to the west of the Oxford Railway Station and current station car park as well as the proposed allocation sites covered by Policy SPCW2 – Botley Road Sites around Cripley Road. This location will play an important part in the overall redevelopment of the area as it is forms a gateway into Oxford once the River is crossed.	We do not consider that is appropriate to extend the WEBRAOF boundary to include this site allocation. This site is located in a residential area of the city, near to the city centre. This approach, given the site's allocation for a net gain of 20 residential dwellings, aligns with the OGC Interim Report. This is because it is a residential led development near to Oxford city centre. In fact, it is one of a number of opportunities involving the redevelopment of brownfield sites close to the city centre, Oxford Railway Station and existing employment sites. Given the site's suburban context, its relatively small size, and the existing uses at the site (including existing residential uses, hotels and an element of Use Class E (retail), this site plays a small, yet important role in supporting the city's overall housing delivery. Most sites that come forward in Oxford are for less than fifty dwellings, but each makes an important contribution helping Oxford deliver much needed housing (in particular, social housing). The Area of Focus is for sites within the western part of the city centre (referred to for many years as Oxford's West End), and has been extended to include the Botley Road Retail Park (which has been seeing a transition over recent years from a 1980s car-dominated retail park to	No change proposed.

	an urban science district with modern R&D space. Given the nature of this allocation, it would not actually benefit from being included within the West End and Botley Road Area of Focus. This is because the site's relatively small capacity for a net gain of 20 residential dwellings is situated in a location which is contextually near to, rather than within, the West End of the city centre, (separated by the hard physical boundary of the railway). The scale and nature of the allocation itself - a residential allocation for a net gain of 20 dwellings, that enables the replacement of existing uses, subject to compliance with the rest of the local policy framework in the plan, by virtue of its location, does not need to be within the Area of Focus. The Area of Focus does not confer additional benefits in relation to the acceptability of land-uses. We do not accept that the WEBRAOF should be extended.	

3209

Policy SPCW1: Banbury Road University Sites – Parcel B

POLICY	**SPN6**
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**SPCW2**

All respondents **raising objections** on this policy/chapter	105.10	
SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
In the policy, replace "minimum number of homes to be developed is" with "development is expected to deliver around".	The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is suitable for the setting. The policy wording is clear that it is a minimum requirement.	None

Policy SPCW2: Botley Road Sites around Cripley Road including River Hotel and Westgate Hotel

POLICY	**SPCW2**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPCW2**			
All respondents **raising objections** on this policy/chapter	81.26	88.11	104.12	159.15

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
Historic England has made a representation relating to Policy SPCW2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Network Rail has made a representation relating to Policy SPCW2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

The Environment Agency has made a representation relating to Policy SPCW2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
ChCh suggests that this Policy should include greater flexibility by the addition of a reference to student accommodation in the list of 'other suitable uses for the site' (i.e. an equivalent number of rooms to the number of dwellings which could be provided when the relevant ratio is applied). Amend the following wording in the supporting text: "Other suitable uses for the site could include: • Hotel accommodation; • Replacement retail (Use Class E); • <u>Student accommodation"</u> No other amendments sought (subject to confirmation of the changes sought to Housing Policies H2 and H3).	The City Council does not accept the inclusion of student accommodation within this policy. This is because the site is located outside the city centre and would not be align with the plan's approach regarding the location of student accommodation. As such we do not accept the proposed change to this policy.	No change proposed.

Policy SPCW3: Canalside Land, Jericho

POLICY	SPCW3
All respondents **supporting** policy	79.1

COMMENT SUMMARY	OFFICER RESPONSE
Content that policy meets soundness and legal compliance tests.	Support is welcomed.

POLICY	SPCW3	
All respondents **raising objections** on this policy/chapter	49.3	104.9

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Noted that bridge crossing is not required and connectivity improvements could be secured via financial contribution where viable; this is welcomed. Bridge crossing will need agreement of Canal and River Trust so outside of applicant's control. In 10 years, a suitable bridge position / design has not been agreed; flexibility to the policy wording re bridge or improvements over the canal should be considered.	The policy wording reflects a flexible approach, which opens possibilities for alternatives to how improved connectivity could be delivered but includes the potential for a bridge crossing, if feasible.	None.
The Environment Agency has made a representation relating to Policy SPCW3, and this is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPCW4: Faculty of Music

POLICY	SPCW4
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW4
All respondents **raising objections** on this policy/chapter	159.16

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Site Boundary: The identified red line for the property does not accurately reflect the true boundary of the property and should be adjusted to include the full extent of the Music Practice rooms and align with the western bank of the Trill Mill Stream. This correction should be carried forward within the Oxford Local Plan 2045 Policies Map, with the site area updated from 0.33ha to 0.32ha to reflect this change. Flood Zone: The site has been identified within Flood Zone 2. The Environment Agency Flood Zone map shows the majority of the site within Flood Zone 1, with only a small area of the southeast corner within Flood Zone 2. It is considered the flood zone should be updated to reflect the majority of the site and read 'Flood Zone 1'. Open space, nature and flood risk:	Site boundary: The basemap display of the site arranges the buildings into simple blocks that aren't always a true reflection of what is on the site. Aerial photography confirms that the site boundary, as is, does capture all the buildings on the site and is therefore correct. Flood Zone: Even if only a small part of the site lies within a Flood Zone, the site is still considered to be within that Flood Zone, which in this case is Flood Zone 2. Open space, nature and flood risk: The 10m buffer zone is supported by the Environment Agency and is a starting point for any development proposal. If it is considered that it would not be possible to retain this 10m buffer, proposals would need to demonstrate why this isn't the case and that the benefits of	Site boundary: No proposed change Flood Zone: No proposed change Open space, nature and flood risk: No proposed change Movement and access: No proposed change

Part b) of the policy should be amended to provide more flexibility so the 10m buffer between the edge of the development should be "considered" rather than "retained". The 10m buffer zone has the potential to provide some amenity benefit for its future occupants and could facilitate improved access to the adjacent Memorial Garden or Christ Church Meadow. Any such access (supported by part j) under movement and access), may require facilitation through appropriate and considered development within the 10m zone. <u>Movement and access:</u> Part j) of the policy states that new residential development should be car free. The policy should be amended to allow for *"provision for disabled parking and essential operational/service vehicle access may be permitted where it is demonstrated to be necessary for the functioning of the academic, residential or student accommodation uses on the site."* As an operational site for academic uses, residential and/or student accommodation, it will be necessary to retain some parking areas to ensure that there is both the opportunity to service the site and/or provide spaces for disabled parking.	not implementing this would outweigh any harm. <u>Movement and access:</u> The site is situated within a sustainable location in the city centre. Whilst part j) of the policy does state that new residential development should be car free, part g) of the policy notes that *"Opportunities should be taken to reduce the level of car parking along Floyds Row."* It is expected that the reduced level of parking will still be able to sufficiently provide enough space for disabled parking and servicing the site.	

Policy SPCW5: Jowett Walk

No representations received against this policy.

Policy SPCW6: Manor Place

POLICY	SPCW6
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW6			
All respondents **raising objections** on this policy/chapter	81.27	89.3	90.9	123.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy SPCW6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy SPCW6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Natural England has made a representation relating to Policy SPCW6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Note that the minimum number of units allocated for the site has remained at 43, which we believe represents an underdevelopment of	A site capacity assessment has considered all relevant factors to come to this figure. The site has heritage constraints which will require	None.

the site. Consider that the site has the potential to accommodate a significantly larger proportion of units given its inner-city location and proximity to campuses and suggest minimum unit threshold is increased to 90 residential units (equivalent to c. 150 PBSA units) in order to promote effective use of land in line with Section 11 of the NPPF.	sensitive design. It also lies within a view cone and within the locally designated high buildings area. The 43 is a minimum figure and does not preclude a higher number coming forward as part of a planning application.	

Policy SPCW7: Nuffield Sites

POLICY	SPCW7
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW7			
All respondents **raising objections** on this policy/chapter	81.28	88.12	104.6	134.11

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy SPCW7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Network Rail has made a representation relating to Policy SPCW7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

The Environment Agency has made a representation relating to Policy SPCW7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
We do not support inclusion of the phrase 'net gain' in the policy as it makes the delivery of the overall aspirations for the Nuffield Sites challenging. We understand that vacant units have already been accounted for. However, the policy is not explicit.	The extant Oxford Local Plan 2036 (OLP2036) allocates minimum numbers of residential dwellings to be delivered across a number of sites in the West End of the city centre. Extant Policy SP1 – West End Sites (OLP2036) sets out minimum numbers of dwellings to be delivered at the Island site and the Worcester Street Car Park site (two of the three sites that make up the Nuffield Sites allocation policy). The total number of dwellings for the Island site and the Worcester St Car Park site, as established through extant Policy SP1 – West End Sites is 58. Policy SPCW7 Nuffield Sites, in the emerging Local Plan 2045 allocates the site for a minimum of 59i dwellings (net gain). This takes account of an additional habitable dwelling, which would need to be re-provided as part of any comprehensive redevelopment of the site. We do not consider that this would be challenging to the delivery of the overall aspirations for the Nuffield sites. We consider that the retention of the phrase 'net gain' to be an important phrase in this policy.	No proposed changes.
We suggest the following modification to part b) to ensure such opportunities are investigated and carried forward, if feasible.	We understand some of the challenges around improving access to the Castle Mill Stream from the Worcester St Car Park Site. As such we can propose a modification to this part of the policy	The following modification is therefore proposed to part b) of Policy SPCW7 to clarify the situation regarding access improvements to

b) Opportunities should be explored taken to improve access to Castle Mill Stream from the Worcester St Car Park site.	to clarify the situation, i.e., that opportunities to improve access to the Castle Mill Stream should be explored, rather than should be taken.	the Castle Mill Stream from the Worcester Street Car Park Site. b) Opportunities should be explored ~~taken~~ to improve access to Castle Mill Stream from the Worcester St Car Park site.
Part e) of the policy, relating to Flood Risk Assessment, is overly detailed. The policy requirements would form part of an FRA as required by national policy. We consider this part of the policy can be simplified.	We do not support the simplification of this policy in the manner suggested. The Level 2 SFRA for this site includes specifics, which have been included in this policy. A consistent approach has been taken to incorporating site-specifics where SFRA Level 2 assessments have been undertaken to support site allocation policies in the plan.	No proposed changes.
Part g) of the policy, which relates to landscape/visual impact assessment states that: With respect to part g) which focuses on landscape / visual impact assessment work, part g) we suggest the following modification: g) ...Special attention will need to be paid to views from the Castle Motte to manage avoid harm to the setting of Oxford Castle. This is because, while the visual impact assessment work will serve to inform and guide any scheme development, it is likely to be impossible given the immediate context to avoid harm completely. Adding this prescriptive restriction is considered unhelpful.	We do not support the proposed changes to part g) of this policy, which we consider would weaken the importance given to designated heritage assets and their setting by the NPPF. Harm to the setting of the Oxford Castle Scheduled Ancient Monument and associated Grade I and Grade II Listed Buildings should be avoided rather than 'managed'. The Plan also includes Policy HD3 – Designated Heritage Assets, which reflects paragraphs 207-221 of the Framework.	No proposed changes.
It must be ensured that the overall aspiration of the Nuffield Sites is not lost or stymied by overly prescriptive or constraining policy. By making this change, the policy requirement still	We do not support the proposed modifications to part "h)" of the policy. Part "h)" aligns with Policy HD4 – Non-designated Heritage Assets,	No change proposed.

ensures respectful and careful consideration is given to this important view. The existing scale and function of the Nuffield Sites, particularly the land south of Frideswide Square and Island Site, must be recognised for their limited contribution to the entrance of the city. To enable transformational change and to achieve the objectives set out in the draft Plan and the West End and Osney Mead SPD, we suggest the following modification to Part h) of the Policy: h) Proposals should review if demonstrate how the existing designated and non-designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach.	which articulates relevant paragraphs of the Framework. Weakening the policy in this way would not be consistent with the importance given by the NPPF to heritage assets.	

Policy SPCW8: Osney Mead

POLICY	SPCW8
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW8				
All respondents **raising objections** on this policy/chapter	57.22	81.29	87.10	104.11	105.11

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
This large brownfield sites close to the centre of Oxford has been effectively vacant for many years. It should have been redeveloped years ago. If used for housing it could take all the homes required to meet Oxford's share of housing need. There are to two distinct issues; flooding and contamination. Neither of these are critical. The flood risk which it seems affects the access road, in and out of the site, could be raised and in any case, flooding should be much less once the Oxford Flood Alleviation Scheme (which is well advanced) is in place. It is quite hopeless that these large post-industrial sites continue to remain as they are when one after another sites in the Green Belt, with poor to non-existent public transport links, are identified as necessary for the growth of Oxford. The policy should address the problem of ensuring this site is redeveloped during the currency of this Local Plan and some incentive should be put in place to make this happen and the reverse if it does not happen such as compulsory purchase. This site is 17.8 hectares, the vast majority if not all of which could be allocated for homes.	While parts of the site are indeed vacant, Osney Mead remains in use as an industrial estate, with many businesses located there. The landowner has expressed an interest in bringing forward an innovation quarter, which would include a mix of uses, including residential/student accommodation, providing flood risk issues (including safe access), satisfactorily addressed. The Oxford Flood Alleviation Scheme (OFAS) once delivered will certainly improve the existing situation. However, OFAS will take a number of years to be implemented in full. We consider that the policy is sound and accurately reflects both the landowner's intentions and what is achievable at the site. All policies include minimum housing numbers. See Policy E1 officer response for further details.	None.

Policy E1 must be less restrictive to allow this.		
Historic England has made a representation relating to Policy SPCW8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxford University Development (OUD) has made a representation relating to Policy SPCW8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy SPCW8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
In the policy, replace "a minimum of" with "around" when referring to dwellings to be delivered on site.	The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is suitable for the setting. The policy wording is clear that it is a minimum requirement.	None

Policy SPCW9: Oxford Railway Station and Becket Street Car Park

POLICY	**SPCW9**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPCW9**			
All respondents **raising objections** on this policy/chapter	43.12	81.3	88.9	88.10

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
This policy does not mention permitting pick up/drop off at railway station by private cars. Include specific text to require such facilities to be provided.	Other policies in the plan address motor vehicle parking. For instance, Policy C8 specifically includes requirements for non-residential development. Bullet point n) of the policy seeks a reduction in car parking spaces at the site. However, changes in car parking at railway stations are subject to confirmation and approval from the Office of Rail and Road (ORR) as set out in the policy. This would include any changes to short stay pick-up and drop off parking.	No change proposed.
Historic England has made a representation relating to Policy SPCW9, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Network Rail has made a representation relating to Policy SPCW9, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPCW10: Oxpens

POLICY	SPCW10
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW10
All respondents **raising objections** on this policy/chapter	85.16

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Sport England has made a representation relating to Policy SPCW10, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPCW11: St Thomas School and Osney Warehouse

POLICY	SPCW11
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW11		
All respondents **raising objections** on this policy/chapter	104.4	139.2	159.17

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The Environment Agency has made a representation relating to Policy SPCW11, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Overall, we have no objections to the allocation of these sites. However, the former St Thomas School building should be specifically retained as a policy condition and sufficient weight needs to be given to its retention and preservation within any forthcoming policy text. Built around	The former St Thomas School is not a designated heritage asset, as such we cannot require its retention. However, bullet point h) already requires proposals to "consider retention of the St. Thomas's School building where possible because of its townscape value	No changes proposed.

1870, this is a good example of a late 19th-century school building, whilst also providing a remnant of the historical evolution of the evolution of the St Thomas's parish and those who lived there as specifically referenced within the Oxford Central (City & University) Conservation Area Appraisal.	and clear representation of past usage of the area". We consider that the policy is sufficient in this regard.	
There are no community facilities currently on site. The units are let on commercial leases, albeit one of the occupiers is a charity. The use class of the properties falls within Use Class E and not that of community facilities. Amend the following wording in the supporting text: Current Use(s): St Thomas site is a former school building now in use by [various organisations including] *charities* [and social enterprises]. Osney Warehouse site is in use *by* a[s] visual arts company including studio, exhibition, education spaces *and storage*[/community uses].	While we note the leasing agreements, we consider that the policy box setting out the current uses is an accurate representation of the organisations that occupy the site. As such, we do not accept the modifications proposed to the "Current Use(s)" in the policy box. These modifications seem to be designed to remove any notion that the occupiers of the site bring social value to the area. OVADA is a non-profit company limited by guarantee (a social enterprise) with a strong community focus, occupying the Osney Warehouse. While the St Thomas School House site is home to a local employment charity and social enterprise (Aspire), as well as being home to other not-for-profit organisations including a Community Benefit Society with charitable aims.	No changes proposed.
Propose the following modification to Policy SPCW11. *Planning permission will be granted for a mix~~ed~~ of use<u>s including employment and / or residential (market, student or specialist forms)</u> ~~development which should include retention or reprovision of community facilities~~. The*	We do not accept the modifications to Policy SPCW11. The introduction of an "and/or" clause in relation employment and housing is at odds with the policy's minimum requirement to deliver 10 dwellings, as such it is not an acceptable change.	No changes proposed.

minimum number of dwellings to be delivered on the site is 10 (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.	Similarly, the removal of the requirement to re-provide the community facilities is not accepted.	

Policy SPCW12: West Wellington Square

POLICY	SPCW12
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW12	
All respondents **raising objections** on this policy/chapter	81.31	105.12

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy SPCW12, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
In the policy, replace “minimum number of homes to be developed is” with “development is expected to deliver around”.	The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is suitable for the setting. The policy wording is clear that it is a minimum requirement.	None

Omission Sites

POLICY	Omission sites
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	Omission sites				
All respondents **raising objections** on this policy/chapter	107.1	128.4	156.2	138.66	138.67
	138.68	138.69			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxford Stadium omission site. The OLP2045 does not carry forward the Site Allocation Policy SP51 in the OLP36, concluding that the site is available but development would mean current community uses would need to cease operations if the site were to be redeveloped. This assumes the site can either be retained in its current state or be redeveloped in its entirety, yet Policy SP51 is quite clear that the permitted enabling development would be residential development '...on the car park or other areas that will not affect the operation or heritage interest...'. The owner would prefer to see this more flexible approach, which would give the greyhound racing and speedway operations the best chance to survive.	The site was submitted in the call for sites for housing. This was discussed with the landowner, to explore whether there was still an interest in housing as enabling development, alongside the use of the stadium for greyhound racing and speedway. It should be noted that, at the time the OLP36 was draft the stadium was not in use for these primary uses and it was thought enabling development would help bring it back. The landowner was clear that, in the context of a stadium brought back into use and currently operating, and following further consideration and the lack of identified alternative parking options, development on the car park alongside the existing uses was not considered feasible. It is notable that the landowner, whilst requesting in their	None.

It is noteworthy that the supporting text to Policy C3 states that 'Policy C3 does not apply to places for outdoor sport and recreation (which are in the Use Class F.2), because these are dealt with in Policy G1. This approach casts doubt on whether the Council considers the site a community use at all, which renders the SHLAA conclusion even more questionable. The owner has previously questioned whether the Stadium is a community use at all, as it is a commercial enterprise and it is not feasible to protect the existing uses or re-provide similar uses within the site in the event that the existing greyhound and speedway uses become unviable. Given the chronic shortage of housing, the landowner does not understand the logic that has led to this site not being allocated in the new Plan. Having no allocation significantly reduces the potential options for the future use or redevelopment of the site should the greyhound racing and/or speedway cease operating.	representation the flexibility of a policy that supports enabling development, concludes by saying that the lack of a policy would make it difficult for housing to come forward should it not be possible to continue the speedway or greyhound racing. It does not seem to be the case that the landowner is now saying that housing development is possible or intended alongside the existing uses. There is no intention to have a policy allocation that says what could or should happen if the current use of the site ends. If it ends, the landowner can make a proposal that would be assessed against the generic policies of the Plan. In terms of the comments about community use- this relates to the explanation in the SHLAA that community uses would need to cease operation if the site were to be developed. This is not trying to give a formal definition of the uses or note which generic policy of the Plan would apply. In any event, motorsport is not included in Used Class F2 and Policy G1 does not apply either. However, the site clearly has a function that is important for the local community and there seemed to be a stark choice of allocating the site for housing which would lead to the loss of this use or not allocating the site.	
Coolidge Close The OLP36 had a policy which is not being carried forward as it is potentially less than 10 houses. No further development should be	It is assumed that the representor is concerned that, without a policy allocation, development will be able to come forward on this site that is harmful to the Lye Valley SSSI. For small sites,	None.

permitted in the Lye Valley and this site is in the groundwater catchment of the Lye.	generic policies in the plan should be adequate. A site allocation does not change the general approach of the plan, it just sets out how it applies to the site and adds site-specific detail and guidance. This site was not allocated in the OLP36 but it is and has been in the SHLAA table c. Development has commenced of the approved scheme for 8 homes.	
Wood Farm Health Centre The OLP36 had a policy which is not being carried forward as it is potentially less than 10 houses. No further development should be permitted in the Lye Valley and this site is in the groundwater catchment of the Lye.	The site is vacant and is available for housing. However, the site is only 0.12ha and too small for an allocation or to be included in Table B of the SHLAA (it is instead listed in Table C). It was not allocated in the OLP36. It would come forward as windfall and would need to be assessed against the generic policies for the Plan (see comments above in relation to Coolidge Close).	None.
Old Road Campus The site policy has been removed or forgotten, although it is in the current OLP36. The policy should be reinstated because the site has issues similar to the Churchill and should have the same requirements as the Churchill. Isses include sensitivity as it is in the catchment of the lye Valley, on site parking, creating increased demand for housing, huge basements that remove water retention capacity of land.	The Old Road Campus has been a previous allocation. The site is built out. The University did at one point put the site forward for the new plan because of a possible intention to extend and add to development on the site in the later years of the plan, but there are not firm ideas at this point and there is no need to have a policy that just repeats the policies of the plan that would apply should development come forward on the site, that would be in the same use as the existing site, and that would be extensions and infill only.	None.
Headington Shark House (2 new Hight Street) This should be allocated for short-stay accommodation. Given the clear absence of	The plan does not allow for hotel and short stay accommodation at all locations because it would compete with the aim of delivering	None.

real harm from the use of the premises for visitor accommodation (noting appeal decision findings) providing an allocation for the site would allow the site to realise its potential and benefit to the local area and economy, but would not harm the wording of the present policy because that allows for allocated sites to come forward. There is no minimum size for allocation. The singular nature of this site means that it cannot be made into a bigger site. It would be an asset to oxford for the site to be able to be used as proposed.	homes as a priority and because it is not likely to be suitable in all locations. Furthermore, whilst there is nothing to prevent very small sites to be allocated, generally sites are only allocated when they are large enough to benefit from site-specific detail. This site is only one house. Generic policies of the plan should be adequate for determining an application. There is no reason to allocate the site as short-stay accommodation contrary to the general aims of the Plan and the spatial strategy.	
Ruskin Field south The failure to meet Oxford's housing needs puts pressure on the Green Belt and adjoining local authorities so it should be apparent that the plan has down everything it can to maximise capacity. Deallocating a development site suitable for housing and student accommodation without any assessment or explanation is not consistent with that obligation. The land immediately north of the Ruskin College campus is 1.19ha and has development potential for c.50 dwellings or considerably more student units. The land has consistently been found by the City Council to be suitable for development. It was allocated in the OLP2036 and assessed as suitable in the withdrawn OLP2040. At Regulation 18 for the OLP2045 (was 2042) an assessment was undertaken for the allocated	Several call for sites exercises were run to inform the drafting of the Local Plan 2045. It was clear that this was to inform the undertaking of a new plan, and affirmations of assumptions about known sites were also requested. A call for sites submission was received for the northern field only. This submission referred to the larger site and existing allocation but did not include them in the red line and none of the technical information related to the current allocation, but rather to the red line proposed. From this submission and in discussions with the landowner's consultants it was understood that the interest had shifted to the northern part of the field. This shift in focus made sense given that there had been a decision taken at the City Council's Cabinet that essentially enabled access into the site from Foxwell Drive. This really changed the	None.

site and the Field to the north, 4,69ha. The assessment concluded there were 'no significant heritage concerns' or other concerns and recommended the whole site should considered further for allocation. Most recently, only the northern field (3.51ha) was assessed and the allocated site was not looked at. The University (of West London) assumed that SP56 was excluded from the assessment because its allocation would be carried over into the new Local Plan. It did not anticipate that SP56 would be de-allocated especially without any assessment or evidence base justification. The City Council did not approach the University as landowner to explain the proposed de-allocation of its land.	ability to bring forward the northern part of the site. Previously, there was no obvious access solution to the site for any kind of market housing scheme because access would have needed to be through the campus from Dunstan Road. The changed access option and information from the landowner as well as discussions with them led the City Council to re-consider the northern part of the Field, that had previously been rejected in favour of the southern part of the field Whilst there may not be constraints that prevent the site coming forward, there are clearly a number of sensitivities that must be responded to. In particular, the site is sensitive in terms of its position in the Conservation Area and next to listed buildings. It also has a pond and wetland features, hedgerows and trees. The need for biodiversity net gain, consideration of priority habitat and Urban Greening Factor, and well as the need to respond to the heritage context, means that significant green infrastructure will need to be retained on site. The smaller site to the south, currently allocated as SP56 is more sensitive in most regards. It is closer to the listed buildings and has thicker vegetation. When other access was not possible, the allocation kept to the southern part of the site, which is also potentially less sensitive in terms of views. However, given the switch to promotion of the	

	northern part of the field, the city council carried out some LVIA work and considered the landower's call for sites submission and agree that there is potential for development on the northern part of the field, albeit very careful design and low heights and densities will still be required. . This has benefits in terms of access and What is out of the question is an allocation that stretches across the whole field. It is vital that an area of green remains in the long views and to maintain some connection with the conservation area's origin as a rural settlement. This is also likely to be necessary because of the biodiversity and green infrastructure sensitivities. It should be noted that the assumption when allocating the southern field was that it would be low density development in order to respond to the listed buildings immediately adjacent and to the conservation area characteristics. The minimum number of dwellings was 20. At no point was it evidenced that SP56 had a capacity of 50 units. At Regulation the larger site with SP56 and the area of draft Policy SPE14 was referred to. However, Regulation 18 Plan was clear that within that was considered to be two separate sites, and that consideration was being given to the northern part over the southern (allocated) part, based on apparent landowner intention:	

	There is a site allocation for housing on part of Ruskin Field. The larger area of the field to the north has been put forward for development by the landowner. The northern part of the field has potentially better access than the allocated site. However, it is potentially more sensitive in terms of the heritage setting of the Old Headington Conservation Area. There is also potential for peat reserves on the site. Further investigation of the site is needed. This in no way recommends that the whole site should be considered further for an allocation. From this wording at Regulation 18 we consider it would have been clear to the landowner that the City Council understood that the northern part of the field had been put forward and that further investigation was needed. A draft of the site allocation policy SPE14 and Ruskin Campus draft policy SPE13 the site was shared with the landowner's consultants in November 2025. Comments were received back to say that the wording was not positive enough about the highly sustainable location of the site, and that constraints were overstated. No question was asked about where the draft policy was for site SP56. It would have been evident, given that two draft policies were shared, that there was not a third one. Allocation of just the northern part of the Field as put forward by the landowner in the call for sites was a consistent approach with all discussions up to that point.	

	Whatever misunderstandings led to this point, the position of the City Council remains the same- the whole field is not suitable for an allocation and, given the current context, particularly in terms of access, the northern part of the field is more suitable for development as long as it responds to the sensitivities of the site as set out in the draft Policy SPE14.	
1 Pullens Lane It is noted that this allocation has been removed from the draft Local Plan, with the Sustainability Appraisal suggesting that, as the site is unlikely to yield more than 10 residential units, it should instead be treated as windfall. However, this reasoning does not reflect the site's strategic value for institutional development. Oxford Brookes University considers that the site remains an important opportunity to support the growth of academic and associated uses in this part of the city. Oxford Brookes University therefore requests that the site is allocated specifically for academic use (Class F), with sufficient flexibility to accommodate ancillary visitor accommodation for visiting lecturers and staff. Such an allocation would provide clarity and certainty for long term planning, ensure that the site contributes positively to meeting identified needs for educational space, and align with the wider objectives for more	The suggestions as described are open ended and require a lot of flexibility without definitive commitments that could be reckoned into housing land supply or economic area calculations. It is therefore not considered that the site will benefit from the level of site-specific detail or policy requirements that would comprise the site allocation approach of this plan. The site is not of a size (i.e. of assumed housing capacity over 10) or subject to a level of complexity that would prevent an application from being determined by generic plan policies or require its own specific allocation.	None.

efficient use of land within the surrounding Area of Focus.		

Supporting documents and miscellaneous comments

Sustainability Appraisal

Sustainability Appraisal	
All respondents **supporting** the Sustainability Appraisal	No representations were made in support of the Sustainability Appraisal.

Sustainability Appraisal					
All respondents **raising objections** to the Sustainability Appraisal	57.23	62.2	64.1	89.31	94.2
	113.2	131.1	158.3		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
SA is not justified in its lack of adequate evidence base, is not positively prepared in proposing that the Local Plan is capable of achieving sustainable development and is unlikely to be effective in in its stated goals or its ability to deliver the required results for sustainable development over the plan. As such, it is also not consistent with the NPPF.	We respond to the concerns about adequate evidence and ability to deliver sustainable development in detail in the following rows of this table. In summary, the Council considers that it has followed all the legal requirements for undertaking Sustainability Appraisal/Strategic Environmental Assessment and that this has appropriately informed the development of the Local Plan 2045.	None

Sustainability Appraisal (SA) grossly underestimates the societal, environmental and economic impacts of the Reg 19 Local Plan 2045 and is not based on proportionate evidence. Prioritising of economic growth through employment (SA topic 12), stipulated as requirements across LP policies, sends a shock wave of negative impacts across the other 11 SA topics, which the Local Plan policies frame as merely aspirational. No evidence is provided in the SA to justify the improvements in the colour coded scoring of SA topics from those in the Summary of the current situation and likely future without a plan (Table 1.2) to the Summary of overall impacts of the Local Plan (Table 1.7).	The Sustainability Appraisal is informed by a variety of data sources as well as expanded analysis of particular topics (e.g. green infrastructure, biodiversity, carbon reduction, natural resources) as documented in the supporting background papers which were published alongside the Regulation 19 Sustainability Appraisal report. The preferred growth strategy in the Local Plan is one that seeks a balanced approach to growth with a housing focus, not employment, as is discussed in Chapter 5 of the Reg 19 SA report. The SA clearly acknowledges a range of impacts across the SA objectives and this has informed the development of the Local Plan. The appraisal of the Local Plan's impacts is summarised in the non-technical summary (the tables referenced in the comment), however, more detailed versions of the appraisals are included in chapter 6. Chapter 6 appraises the impacts of the Local Plan policies (section 6.1), then the site allocations (section 6.2), then brings this together in the Whole Plan appraisal (section 6.3). The Whole Plan appraisal includes commentary (see Table 6.3) alongside the scoring which seeks to set out our reasoning for determining particular scores as transparently as possible. Whilst there is inherently some level of subjectivity/uncertainty in any such appraisal process, we are comfortable that the determined impacts against each of the SA	None

	objectives are justified and that this analysis has then appropriately informed the decisions taken in the wider Local Plan process.	
A respondent (Oxford Doughnut Economics Collaborative – Rep ID 64.1) has provided an alternative assessment of the Local Plan 2045's impacts against the 12 Sustainability Appraisal objectives. This includes suggested scores which generally indicate that the Local Plan's impact against each objective needs to be identified as more negative, or significant negative, compared to the assessment set out in the Reg 19 Sustainability Appraisal.	See response above which of relevance to this point. We would add that it is important to remember that the role of the Sustainability Appraisal process is to inform the development of the Local Plan, including helping to inform ways of mitigating any potential adverse effects that the plan might otherwise have. Sustainability impacts cannot always be avoided or entirely negated, and the SA report is as transparent about this as possible. We have reviewed the alternative scoring provided, however, we remain comfortable with the scoring of the Local Plan's impacts and the justifications as set out in Table 6.3 of the Reg 19 SA report. The SA process we've followed meets the legal requirements and has led to informed decisions which have been taken in developing the Local Plan (e.g. in relation to mitigations incorporated across the Local Plan's policies).	None
Oxfordshire County Council has made a representation relating to the Sustainability Appraisal, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
There were comments received flagging objections to the proposed monitoring framework as set out in Table 1.8. These included that the proposed framework is 'worthless' as it fails to specify any baseline	Chapter 8, paras 8.1 to 8.3 detail the rationale behind the proposed monitoring framework included in the Reg 19 Sustainability Appraisal report. It identifies that the Council seeks to report yearly on a variety of policy areas as part	None

data or targets, any means of delivery or any actions to be taken as a result of this monitoring. Another respondent suggested that the monitoring process for LP impacts should be overhauled to measure year on year genuine improvements across the 12 SA topics with data indicators to meet specific targets. It was felt that this would allow for genuine scrutiny.	of its Authority Monitoring Reports but that there are constraints in terms of resourcing to undertake monitoring, and that some data resources informing monitoring indicators are updated on longer time periods than yearly. As such, we have sought to propose a realistic and implementable SA/SEA monitoring framework that includes a mix of yearly and more long term monitoring, as set out in Table 8.1 in the report.	
The Sustainability assessment of SPS8 Land at Meadow Lane plays down the impacts of development across many different topics. Housing delivery is erroneously scored as ++ with no comment give to clarify that no housing number has been stipulated - effectively a zero allocation for housing. Erroneous assessment downplays the site's high sensitivity and cannot promise housing. This is unsustainable, not properly prepared and therefore both unsound and not legally compliant and SPS8 should be removed from the Local Plan to correct this.	The Sustainability Appraisal framework used to inform the assessment of sustainability impacts from the site allocations is published in Section 3.4.2 of the Regulation 19 Sustainability Appraisal report (and was published in the interim version consulted on at Reg 18 Preferred Options stage also). Table 3.8 in that section of the report sets out the decision-making criteria for the different scores to be assigned under the housing objective. This sets out that a ++ score should be given under the housing objective, where the sustainability appraisal for a site indicates that it has capacity for 10 or more dwellings. Where identified sites have the capacity for less than ten dwellings, the SA process would not consider them further for assessment, and they would not result in a site being allocated in the plan. Only development sites with capacity for ten or more dwellings result in a site allocation. The Sustainability Appraisal is an evidence base document, and a key decision-making tool in	None

	the plan-making process. As such, it has been used to inform the plan-making process, not the other way around.	
The sustainability assessment for SPS8 demonstrates how the site has been misunderstood, analysed insufficiently and downplays the significance of the site. Various issues flagged with the assessment (*as part of a separate submitted document – see rep ID 158.3*), including failure to identify the site as ancient meadow and thus the integral part of the Iffley conservation area. Failing to fully recognise the full heritage value of the site, including that it is historically undeveloped site and a survivor of east Oxford's agricultural history, as well as sitting in the setting of various listed buildings. Issues flagged with regard to ecology also , such as failing to recognise the ecological and/or carbon sequestration value of the hedges, of what could be considered to be 'floodplain meadows' with associated species that have the potential to be restored, also that there are various protected species present including 7 species of bats including nationally rare species nearby as well as badgers. The sustainability appraisal includes unresolved and uncertain issues including that the site is within Iffley conservation area and is within the setting of listed buildings and of non-designated heritage assets, as set out above.	The sustainability appraisal site assessment for SPS8, as well as the separate site capacity assessment form, identifies a range of constraints on the site and these have informed the allocation. In relation to the sustainability appraisal assessment for the site, the SA site assessment form as included in Appendix C of the Reg 19 Sustainability Appraisal report, already identifies potential negative and significant negative impacts against the range of heritage criteria under SA objective 11, as well as under ecology and biodiversity SA objective 10. It also picks up other constraints across the objectives. The potential for negative impacts identified through the SA assessment, alongside other work such as the separate site capacity assessment process has informed the detail of the allocation as set out in Chapter 8 of the Local Plan 2045, including a range of requirements in relation to mitigating impacts on heritage, biodiversity etc.	None
The SA does not test higher levels of growth than the Standard Method (SM), which is considered odd as it is plainly a 'reasonable	The Sustainability Appraisal has tested alternatives for setting a housing requirement at, below and above the Standard Method.	None

alternative'. The appraisal of the growth strategy alternatives identifies that whilst a case could be made for boosting greenfield/brownfield supply to either support housing or economic growth, this would come at considerable cost in terms of wider objectives. The appraisal of housing requirement policy options (option set 001) then goes on to test three options, however, option A appears to be dismissed simply because a higher level of growth could not physically be accommodated in Oxford City itself or would put pressure on other land uses. Option C (setting a requirement above SM) is concluded to also not be deliverable due to the limited capacity in the city (and acknowledging that it would result in more unmet need being generated beyond boundary). The Council's approach/preferred option is therefore based on the limited capacity of the city to ensure that the policy is deliverable and meets the tests of soundness. This approach is inconsistent with national policy (e.g. NPPF 2024 paras 24 – 28) – effective strategic planning, especially to promote growth, across local planning authorities boundaries. It is considered that in order to meet the unmet needs it falls to Oxford City to work with its neighbouring authorities to identify additional supply to meet these needs as part of their duty to co-operate, but also the requirements of the NPPF in terms of maintaining effective cooperation are relevant (as duty to co-operate	This testing was published as part of the interim Sustainability Appraisal published at Reg 18 Preferred Options stage, and then updated and published again as part of the Regulation 19 Sustainability Appraisal (e.g. to reflect the further work on the Local Plan and supporting evidence such as the Strategic Housing Land Availability Assessment (SHLAA)). Section 5.2.2 of the Regulation 19 Sustainability Appraisal report discusses this testing (see section addressing option set 001a – paras 5.40 to 5.43 and Table 5.6). The full appraisal of the options that informed this was also included in Appendix A, this includes expanded commentary on the rationale for how scores were determined in Table 5.6. The SA report details the reasoning for why the Council's preferred Option was Option B.	

about to be removed). Whilst Oxford City is constrained in terms of capacity to accommodate future housing needs, the Plan needs to be prepared in the context of overall growth taking into account the Government's new Growth Commission for Oxford which was set up in May 2025 to help accelerate growth in the city and its surrounding area.		
The Sustainability Appraisal's Options have not had due consideration to Oxford's importance to the economy, as confirmed in the Employment Land Needs Assessment (ELNA), in electing Option B when considering the Housing Requirement following the SA process. Curious that Option C was not given more consideration, as it gives greater acknowledgement of the requirement to grow beyond the LPA borders after confirming the economic significance of the settlement and surrounding area. Option C allows for a housing requirement higher than the standard method, to allow for stronger support for economic growth or affordable housing need, whilst recognising the necessity for this growth to be supported by the surrounding areas.	See response above. The options considered for housing requirement were tested equally. The rationale for selecting the preferred option is set out in the SA report (see paras 5.42 and 5.43). In this discussion, it is clearly acknowledged that the other options for setting the housing requirement (e.g. higher than the Standard Method) could have greater positive impacts in relation to delivering housing and economic growth, but that they also come at greater cost in terms of significant negative impacts against other sustainability objectives.	None

Evidence Base

POLICY	Evidence Base

All respondents **supporting** parts of the evidence base	90.16	161.3

COMMENT SUMMARY	OFFICE RESPOSE
Natural England has made a comment in support of the Habitat Regulations Assessment, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
National Highways has made a comment relating to the Transport Modelling, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	Evidence Base				
All respondents **raising objections** on parts of the evidence base	92.4	92.6	92.7	139.7	101.6
	138.1, 138.17 and 138.26	104.13	89.32	85.3	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxfordshire County Council has made a representation relating to the Habitat Regulations Assessment, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Cherwell District Council has made representations relating to various parts of the evidence base including the Employment Land Needs Assessment, Playing Pitch Strategy Interim Note and Green Belt Assessment; these are summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
[See original letter for full rep] ... the Local Plan Viability Assessment Update (December 2025) does not include a specific allowance for contributions towards healthcare. ... In our view the S106 headroom identified as part of the site-specific testing is generally sufficient to enable financial contributions to be secured for healthcare, and therefore we consider that overall the assessment of plan-wide viability demonstrates that policy requirements in relation to healthcare infrastructure contributions are deliverable. However, we are concerned that without explicit mention of required healthcare mitigation in the viability assessment, healthcare mitigation will compete with other planning obligations or be ignored entirely. We would recommend that the viability assessment includes a separate cost input for typologies where a healthcare contribution is expected. This would ensure that healthcare mitigation is appropriately weighted when	Contributions towards healthcare provision would, where applicable, be sought under a general S106 or CIL agreement. This is addressed by general Policy S3 Infrastructure Delivery in New Development, unless there is a specific on-site requirement for healthcare in which case it is referenced in the site allocation policy. Healthcare infrastructure is also identified in the Infrastructure Delivery Plan, that accompanies LP2045. The Viability Assessment for LP2045 builds in an assumption about the total level of S106 contributions sought from developments, which was informed by reviewing recent real life S106 agreements for a range of development types in Oxford. These would have covered contributions towards a range of uses, including healthcare where applicable. For testing purposes, the assessment assumed a 'base' level of contributions amounting to £4,000 per unit (plus £1,000 for Section 278) and £25 per square metre of commercial floorspace (Viability Assessment, para 4.32).	None

evaluating the potential planning obligations necessary to mitigate the full impact of a development. A separate cost input for health would also mean that developers are adequately informed in advance, in accordance with ICB's estate strategy and the development's location and size, that they may be required to make on-site provision or off-site financial contributions to mitigate the impact on healthcare infrastructure resulting from their development. Such an approach would also support the effective implementation of Draft Policy S3 in situations when a viability assessment demonstrates that development proposals are unable to fund the full range of infrastructure requirements. We would welcome further engagement with the Council to on this issue to determine a reasonable cost assumption that could be used in future viability assessments.		
The Oxford Green Belt Additional Sites Assessment is too restrictive in focusing only on the geography of Oxford. This only serves to clarify the limited and constrained opportunities for the city to accommodate additional housing and fails to consider the possible opportunities for expansion that could be explored collaboratively with neighbouring authorities.	The methodology in the latest Green Belt assessment reflects the most recent changes in the NPPF and PPG. The PPG states that authorities must identify an appropriate scale of Green Belt assessment that delivers clear variations in contribution to the Green Belt purposes. Further details can be found in Background Paper 006 which acknowledges that there are both grey belt and Green Belt sites that merited further investigation for development potential. Further work was undertaken by the Council and resulted in the	None

	inclusion of an additional site allocation (SPE9 Marston Paddock extension). The Council cannot allocate land that is not within its jurisdiction and has taken the most pragmatic approach. This does not preclude further Green Belt work being undertaken in collaboration with neighbouring authorities in the future.	
The Green Infrastructure Study (GIS) 2022, part of the evidence base for OLP2045 and informing the Policy Map, is wholly deficient, factually wrong, presenting derived, and incorrect, information without explanation or evidence. Various concerns raised (*see full rep provided by respondent 186*) including reliance on cut and paste methodology and text, with fundamentally flawed methodology and data. Too many errors in various figures such as Figure 13 and Figure 14. This was pointed out the multiple errors in the survey consultation and ignored. The incorrect mappings are subsequently duplicated on the OLP2045 Policy Map. The Council has proceeded to build on almost all remaining accessible green space in the City, mostly in Council estates, leading to population growth and reduction in green space, creating inequalities, prior to 2001. It is also noted that the poorer suburbs are the most green space deprived, the greatest population increases and most building.	The Green Infrastructure Study is comprehensive and includes analysis covering a range of topics including accessibility, levels of deprivation, playgrounds/sports facilities etc. It provides an up-to-date picture of green infrastructure provision in the city and includes independent assessment across a range of topics. The GI study highlights various findings and recommendations based upon desktop study and site visits, many of which follow similar themes of previous studies – including the inequalities in access to different types of open space in the city (and the need for preventing this worsening where possible), the range in quality of spaces across the city, and the need for targeting greening measures in a variety of ways across the city particularly in light of Oxford's various constraints and pressures on land. As documented in Background Paper 005a, (which further contributes to the evidence base supporting the Local Plan's approaches to green infrastructure), whilst it was an important starting point informing the	No further change proposed.

Previous assessments undertaken such as the Green Infrastructure Surveys 2007/2020 are considered to be of a much higher quality. These found many "Urban Villages" in Oxford were green space deprived leading to inequality. They made various reccomendations, such as recommending standards of green space per 1000 residents, that more unrestricted green space should be found; that the Council should seek to find more open space by change of access, or new green space due to an estimated increase in population between 2001-2011 of 2.8%.	approaches in the Local Plan including the green infrastructure network protected through Policy G1 it was not the only factor influencing the approach. The Council subsequently went on and refined the network including identifying additional spaces from various sources (including previous consultations) and undertaking further analysis which went in to defining the hierarchy of Core and Supporting spaces. Where feedback from the Reg 19 consultation identifies additional issues or changes needed to the policy or the policies map, these are responded to in the relevant sections of the consultation report, the Council will propose modifications where it agrees a change could help to address a soundness issue.	
The Lye Valley Hydrogeological Impact Assessment report is considered to be extremely disappointing and full of basic errors with meaningful guidance entirely absent. Shows a very poor understanding of the Lye Valley and has clearly not grasped even the basic issues or proposed any meaningful solutions. Respondent 138 includes a detailed appendix as part of their representation with a range of specific comments (*see original rep for full detail*) including in relation to: - Objections over the methodology undertaken for the study;	A response was provided as part of the consultation summary report to the Regulation 18 consultation, this set out that the study is considered to be important as it provides an additional level of analysis and understanding about the hydrogeological functioning of the areas (with a focus on the SSSI) and its key sensitivities which was not available previously. We understand that there may be some disagreement as to the methodologies and conclusions, however, we remain of the view that this is a useful piece of additional evidence supporting the approach to handling applications that might affect the Lye Valley.	No further change proposed.

- Objections over data sources referenced in the study or not referenced; - Disagreement over the key findings and conclusions including how these have informed the impact risk zones/tests proposed for development proposed; - That the work of the previous study looking at the area, the Lamberth report, has not been given sufficient attention, or ignored. The report remains unchanged following the Reg 18 consultation, with none of the defects raised during the consultation, addressed. It is argued that any policy in the Local Plan which is reliant on the report is unsound/unjustified for this reason.	Whilst the Local Plan is not reliant on the study alone, the work further supports the ongoing protection of the wider Lye Valley through the approaches we have embedded into the Local Plan through Policy G6, as well as cross references in various site allocations in proximity to the site. For example, it helps to highlight the complex nature of the catchment and reinforces that the considerations for how to protect the SSSI and surrounding habitats varies depending on type of development, and its location within the particular impact pathways influencing the area. This context helps to ensure that interventions which applicants will need to undertake to meet their responsibilities set out in national and local policy are as targeted and effective as they can be. Alongside the study, we have developed a Technical Advice Note which will further clarify how applicants should approach mitigation of impacts on the Lye Valley.	
Sport England has made a representation relating to the Playing Pitch Strategy and general evidence base supporting sport provision, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made representations against the Level 1 and Level 2 SFRA, which are summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

The Environment Agency have also made comments linked to the Water Cycle Study strongly advising the Council to continue to liaise with Thames Water to receive confirmation and assurances around ensuring enough discharge capacity will be available at the Oxford Sewage Treatment Works in the short to medium term.	Noted, the Council will continue to engage with Thames Water and the Environment Agency on this topic.	Continue engagement together.

Policies Map

POLICY	Policies Map
All respondents **supporting** the policies map	No representations were made in support of the policies map.

POLICY	Policies Map				
All respondents **raising objections** on the policies map	58.8	60.8	*93.9*	103.2	120.1
	128.3	111.6	138.2		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
It is unsound that the Policies Map does not designate the Old Marston Road shops - which include New Marston's only pharmacy and	As explained in the supporting text for policy C1, designation of an area as a local centre takes into consideration the importance of the area beyond the immediate neighbourhood,	None.

post-office – as part of the New Marston local centre.	the level of connectivity and the suitability for a range of uses. The shopping parade in question does not have the scale to be considered as a local centre in its own right, and as it is located in a predominantly residential area some distance away it is too isolated from the designated Marston Centre to be considered as part of it.	
In order to improve the effectiveness of the LP and the deliverability of the site (SPE14 Ruskin Field) it is requested that the policies map is amended to include land to the west, to accommodate the proposed access, to connect to Foxwell Drive as identified at Appendix 1.	Refer to officers responses to SPE14 representations.	Refer to officers responses to SPE14 representations.
We believe that the boundary of the Headington District Centre ought to be altered to include no's 2, 2a, 4a – 4f New High Street. As well as Shark House – and the proximity of its neighbour to the north (no 2a) to the beer garden of the Royal Standard PH – the identified terrace on the western side of New High Street also includes a hairdresser and barber's shop.	The sites in question comprise of residential properties and a hairdresser. They are not part of the frontage of the district centre and do not provide amenity or importance beyond the immediate neighbourhood so do not in themselves merit inclusion within the designated district centre area.	None.
Manzil Way Resource Centre is incorrectly labelled policy SPE7 on the policies map and should be changed to policy SPE8.	This has been noted and site reference will be amended as a minor modification.	Minor modification.
The OLP Policies Map and Local Plan must be updated to: • Correct incorrect and sloppy boundary markings. • Add missing green areas with correct designations. • Visually mark restricted, semi-restricted and	The local plan is required to address policies, designations and allocations that are within the administrative boundary of Oxford, so it would not be appropriate to include development sites outside of the boundary.	None.

fully accessible green spaces • Add Development outside OCC's boundary. • Add playgrounds with a policy to resist removal Accessibility of green space must be correctly marked to avoid developer challenge and marked clearly on the Policies Map with red (inaccessible, brown (some accessibility), green (public access) as per the Green Space Survey of 2005/2007.	Efforts have been made to make the policies map as comprehensive as possible given time and resource constraints , and factual corrections when specifically identified can be made on an ongoing basis as required. On the interactive policies map the Green Infrastructure (GI) network spaces are identified by name, typology, designation in line with policy G1, and where known subtypology. The level of detail provided has been set at a level suitable to support the policy objectives and to be as user friendly as practical as possible.	
'Oxford Brookes Marston Road Campus' is indicated as site code SPE 10, not SPE 11 as in the 'Appendix 08 Infrastructure AOF and Site Allocations' document. 'Milham Ford Field and Quad LWS 50I05' seems not indicated on the map by horizontal bar green bars as are other LWS within the city.	This has been noted and site reference will be amended as a minor modification. Visibility settings on the interactive map will be adjusted to ensure that the LWS can be viewed at larger scales.	Minor modification.
South Oxfordshire DC and Vale of White Horse DC commented on the appropriate extents of the policies map in relation to designations and safeguarded land for infrastructure.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Miscellaneous Comments

POLICY	Miscellaneous Comments		
All respondents **supporting** through other miscellaneous comments	161.4		

COMMENT SUMMARY	OFFICE RESPOSE
National Highways has made supportive comments on the draft Oxford Local Plan 2045, which are summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	Miscellaneous Comments				
All respondents **raising objections** through other miscellaneous comments	154.1				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The Draft Local Plan is 'Unsound' because its 'public consultation' which should have been designed to ask people's views of the proposed policies instead, by misleading wording, led people to agree to a policy which, had it been	This response is directed towards the Regulation 18 Stage Consultation process and materials. The Reg. 18 Stage consultation was undertaken in line with the Statement of Community Involvement (SCI). We consider that the approach taken to consultation went beyond the statutory minimum requirements.	No further action.

expressed more clearly, they would never have agreed to. The draft Local Plan is unsound owing to the faulty process of Public Consultation which underpins it		

3252

Appendix 1 – Statements of Common Ground tables of comments/responses

The following appendix includes tables of comments received from bodies with which the Council is undertaking Statements of Common Ground along with officer responses.

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Natural England

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
G1	**Policy G1 – Protection of Green Infrastructure** NE welcomes the inclusion of a Green Infrastructure (GI) policy.... NE welcome the identification and protection of those spaces forming part of the GI core network G1A and G1B as identified on the proposals map.	Support for Policy G1 and the identification of the Core (G1A) and Supporting (G1B) spaces is welcomed.	No change proposed
G2	**Policy G2 – Enhancement and provision of new green and blue features** <u>Watercourse buffer</u> The plan recognises the opportunity to enhance blue corridors and NE welcome the inclusion of a commitment to restore bankside and instream habitats, leaving an undeveloped buffer zone of at least 10m width. We would encourage you to identify those site allocations where these opportunities exist and provide details of the buffer zone requirements within each of the allocation policies to ensure that these opportunities are a requirement. This would be particularly beneficial where sites are adjacent to SSSI or SAC sites and would act to enhance and	<u>Watercourse buffer</u> Representation relates to certain site allocation policies only. See representations for SPCW6 – Manor Place, and SPS8 – Meadow Lane The proximity of development sites to SSSIs has been assessed in the Source Pathway Receptor Analysis. Any site allocations within Impact Risk Zones (IRZs) for the relevant SSSIs have been identified in the relevant site allocation policies.	<u>Watercourse buffer</u> No change proposed to Policy G2.

3254

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	strengthen the existing identified G6 ecological and G1 GI network.		
G4	**Policy G4 – Delivering mandatory net gains in biodiversity** Higher than 10% BNG target NE welcome the inclusion of a commitment to deliver the mandatory 10% net gain in biodiversity. NE encourages the City Council to be more ambitious and consider a higher percentage to align with the shared regional principles of the Oxford-Cambridge Growth Corridor – i.e., 20% Strategic approach The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of biodiversity networks. Off-site reprovision of BNG Where reprovision of BNG cannot be delivered on site, the plan should set out where this might be delivered across the ecological network (Policy G6) across the plan area, in a similar way that is proposed within policy G1 for GI provision.	Higher than 10% BNG Target As set out in previous discussions, whilst we have elected to maintain a 10% Biodiversity Net Gain (BNG) target, which aligns with the legislation, Policy G4 encourages a higher delivery of BNG where possible. National guidance is clear the plan-makers should not set targets that exceed 10% unless this can be justified. Setting a policy target that exceeds the mandated 10% in Oxford is likely to be challenging due to the constrained nature of many of the site allocations. A higher target could also result in additional offsetting payments for biodiversity units being delivered through offsetting into biodiversity net gain elsewhere, outside of Oxford. Instead, we have sought a locally tailored approach to boosting gains for biodiversity and the wider environment which fits with Oxford's setting, as discussed further below. Strategic approach Chapter 4 of the Local Plan 2045 provides an over-arching approach to supporting both the Green Infrastructure (GI) and biodiversity networks, which aligns with your comments. Policies G1-G6 set out a strong hierarchy of protection for existing green features through Policy G1 and more explicit requirements for ecological sites (Policy G6). The Local Plan promotes new greening with Policy G2 seeking to secure new multi-functional green features,	Higher than 10% BNG Target No change proposed Strategic approach No change proposed Offsite reprovision of BNG No change proposed

3255

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
		whilst we are also including a new policy for Oxford focussed on increasing surface greening via the Urban Greening Factor (Policy G3) - adapted from NE's own guidance. In relation to securing more space for biodiversity, the Local Plan includes specific requirements for the delivery of onsite ecological enhancements that are important for many priority species but not recognised through the BNG process (Policy G5). This would sit alongside and enhance the provisions of the Statutory BNG requirements. <u>Offsite reprovision of BNG</u> Policy G4 already prioritises the delivery of BNG onsite and sets out a hierarchy to be followed where on-site (or adjacent) delivery is not feasible, in line with Natural England's suggestion. We have sought to ensure that the LNRS is incorporated into this hierarchy, so that applicants are guided by the opportunities it identifies where onsite delivery is not possible. The policy also recognises that there will be opportunities to deliver BNG that aligns with the delivery of measures identified in the LNRS. This will be particularly relevant where development proposals are located in areas identified within the LNRS. Separately, where site allocation policies contain land that has been identified within the LNRS, a reference is included within each policy.	
G6	**Policy G6 – Protecting Oxford's biodiversity including the ecological network**		

3256

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	General comment ... Local ecological networks form part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Ecological enhancements ...Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks. General comment re: sites within Oxford's ecological network NE welcome the commitment to safeguard key sites within Oxford's ecological network (including Oxford Meadows SAC). Adjacent to SSSI/ SAC etc. NE encourage the City Council to identify those site allocations which are proposed on land immediately adjacent to the SAC and SSSI and stipulate within the allocation policy that appropriate buffering and delivery of habitat supporting the interest features of the designated site will be required. Irreplaceable habitats We encourage the City Council to be ambitious in terms of the protection, strengthening and enhancement of the ecological network and suggest a commitment to the protection of	General comment General comment noted. Ecological enhancements Policy G2 sets out how enhancements to the green and blue infrastructure network should be delivered, while Policy G4 sets out how BNG requirements are to be delivered prioritising on-site and then off-site delivery. Together these policies work to contribute to the enhancement of ecological networks. General comment re: sites within Oxford's ecological network General comment noted. Sites adjacent to SSSI/ SAC etc. The Local Plan 2045 does not allocate any sites immediately adjacent to the Oxford Meadows SAC. The proximity of development sites to SSSIs has been assessed in the Source Pathway Receptor Analysis. Any site allocations within Impact Risk Zones (IRZs) for the relevant SSSIs have been identified in the relevant site allocation policies. The following four policies are located immediately adjacent (or very close to) a SSSI. *Policy SPS14 – Redbridge Paddock* is separated from the Iffley Meadows SSSI by the River Thames. The policy recognises that the site lies within the identified impact risk zone for the Iffley Meadows SSSI. Policy wording has been included to ensure no adverse impacts on the SSSI. Additional policy wording has been included that relates to the incorporation of SuDS and a groundwater and surface water assessment. *Policy SPE1 – Churchill Hospital* is adjacent to the Lye Valley SSSI. The policy box for the site highlights this,	General comment No change proposed Ecological enhancements No change proposed General comment re: sites within Oxford's ecological network No change proposed Adjacent to SSSI/ SAC etc. No change proposed Irreplaceable habitats No change proposed Nature recovery network No change proposed

3257

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	irreplaceable habitats and priority habitats (such as lowland fen), in the policy wording. <u>Nature recovery network</u> NE encourage the City Council to consider the Oxford Nature Recovery Network and welcome the reference to the Oxfordshire Local Nature Recovery Strategy in the site allocation policies.	and the site's location within the identified impact risk zones for the Lye Valley SSSI. Policy wording has been included to ensure no adverse impacts on the Lye Valley SSSI. Policy wording has also been included to ensure that the applicable tests identified within the relevant risk zones in the Lye Valley Study/ TAN are satisfied. Given the site's proximity to the SSSI, additional text relating to construction buffers and watercourse buffers (Policy G2) has also been included. *Policy SPE10: - Nuffield Orthopaedic Centre* acknowledges the proximity of the site to the Rock Edge Geological SSSI, situated on the other side off Windmill Road. The policy includes policy text relating to a construction buffer. Appropriate text has also been included in the policy in relation to the site's location within the identified impact risk zone for the Lye Valley SSSI. *Policy SPCW6 – Manor Place* identifies the proximity of the site to both Magdalen Grove Geological SSSI (adjacent) and the New Marston Meadows SSSI (within the impact risk zone). Given the proximity of the site to the Magdalen Grove Geological SSSI text has been included within the policy relating to a construction buffer. Appropriate text has also been included in the policy in relation to the site's location within the identified impact risk zone for the New Marston Meadows SSSI. No other site allocations have been proposed adjacent to SSSIs. <u>Irreplaceable habitats</u>	

3258

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
		Policy G6 includes a specific section that covers *internationally and nationally designated sites and irreplaceable habitats*. This section of the policy refers to the appropriate sections of the NPPF (paras 193-195), or their equivalent paragraphs in any update of national policy. Local Plans drafted under the NPPF (Dec 2024) should be in conformity with national policy and as such the national policy position with regard to irreplaceable habitats has not been duplicated in the Oxford Local Plan 2045. <u>Nature recovery network</u> The TVERC Nature Recovery Network (NRN) has informed the development of the city's GI network (particularly the network of core (G1a) spaces. Where the Oxfordshire NRN identified a green space in the city containing a significant area of "core space" as defined by the TVERC NRN, and it was determined that space contributed to a clear green corridor function within the city, this resulted in those spaces being designated as part of the core GI network for Oxford.	
Omission poilcy	<u>Lye Valley SSSI: Further details</u> NE encourages the City Council to include the details of a policy specific to the Lye Valley SSSI and the requirements for development in relation to SuDS etc., within a Local Plan policy rather than a Technical Advice Note (TAN). NE appreciates that the evidence (hydrogeological survey) that will guide planning requirements has only just	<u>Lye Valley SSSI: Further details</u> Policy G6 provides the overarching protection for all the designated sites including the Lye Valley. The supporting text explicitly references Lye Valley as one of the SSSIs with particular sensitivities and sets out the types of adverse impacts it is susceptible to. Furthermore, we have also included on the policies map the Impact risk Zones identified through the JBA Hydrogeological Report, to assist applicants. We expect that the Technical Advice Note will then provide further guidance for applicants, informed by	<u>Lye Valley SSSI: Further details</u> No change proposed, however, we look forward to continuing to engage with you on finalising the Technical Advice Note ready for publication.

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Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	been published and that the TAN is under development. However, if it is possible to incorporate this into the Local Plan that would be preferable to a TAN.	the JBA study, in how these adverse impacts should be addressed in each of the Impact Risk Zones. Additionally, we would flag that we have also sought to include explicit encouragement for applicants within the Marston Road and Old Road Area of Focus policy to explore opportunities for design interventions on their sites that could go further than mitigating harm and secure a betterment for the Lye Valley (e.g. reducing hard surface cover). See supporting text to that policy and also criterion C of the policy.	
SPN3	**SPN3 – Oxford North Remaining Phases** <u>Public open space delivery: HRA mitigation</u> NE advises that the GI provide as part of the development within the SPN3 allocation is mapped and included within the Core GI Network (Policy G1) as it forms part of the mitigation for recreational impacts on the Oxford Meadows SAC and should therefore be protected from development in perpetuity.	<u>Public open space delivery: HRA mitigation</u> Some of the public open space that has been provided to mitigate recreational impacts at the Oxford Meadows SAC has already been delivered on land which falls outside of the emerging Local Plan 2045 site allocation. However, the entire site areas is included within the redline boundary of the outline planning application. As the delivery of the publicopen space is being administered through the implementation of that application (which is ongoing), that is why it has not been formally designated as part of the GI network. The Council will consider how best to ensure that this particular public open is maintained beyond the requirements of the planning permission.	<u>Public open space delivery: HRA mitigation:</u> No change proposed
SPE1	**SPE3 –Government Buildings and Harcourt House** <u>General comment</u> NE welcome recognition that there may be hydrological impacts from development at this location on the New Marston Meadows SSSI.	<u>General comment</u> General comment noted. <u>Fragmentation of linkages</u>	<u>General comment</u> No change proposed <u>Fragmentation of linkages</u> No further change proposed

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Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	Fragmentation of linkages However, due to its proximity to the SSSI (and the presence of open mosaic priority habitat) and the site's likely high biodiversity value, NE concerned that development here will impact on the wider ecological network to which the site is linked potentially resulting in the fragmentation of linkages of linkages. NE state that "further information should be provided to evidence whether the site is deliverable"	The policy sets out that proposals should seek to retain existing features wherever possible. Additionally, under criterion c, as part of maintaining the UGF score, the policy encourages new or enhanced features which should seek to enhance connections through the site, such as wildlife corridors. We believe this helps to address NE's concerns relating to fragmentation of linkages. Criterion e flags the presence of priority habitat on site and sets out expectations of applicants where they could impact this. As with all the allocations, we have sought to consider a range of factors (e.g. biodiversity, heritage etc) in coming to the minimum capacity of the site and the requirements set out in the policy. The narrative of this assessment is captured in the site capacity assessments within the evidence base.	
N/A	N/A - Headington Hill Hall and Clive Booth Student Village (SPE3 – policy reference refers to site no longer put forward in the Oxford Local Plan 2045)	This representation relates to a site that was not taken forward in the Oxford Local Plan 2045.	No change proposed
SPCW6	**Policy SPCW6 – Manor Place** General comment NE welcomes the recognition that there may be potential hydrological impacts from development at this location on New Marston Meadows SSSI, and that any proposals coming forward will require a hydrological assessment and SuDS. Priority habitat There are pockets of priority habitat located within this allocation which will contribute to the ecological network, and the site as a whole will likely be of	General comment General comment noted. Priority habitat Policy box for SPCW6 already notes that the site may contain S41 (Priority/Principal) habitats Watercourse buffer (Policy G2) We can insert some wording in the policy to align approach with other site allocation policies that are located adjacent to watercourses.	General comment No change proposed Priority habitat No change proposed Watercourse buffer (Policy G2) We suggest the following mod could be proposed: *f) A buffer should be retained along the watercourse* ***(Policy G2)***.

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Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	high biodiversity value give the habitats present here and its location next to the River Cherwell. Watercourse buffer (Policy G2) NE encourages the City Council to identify the requirement for a buffer strip to be put in place of at least 10m from the River Cherwell as per Policy G2 to ensure that this is clear within the allocation policy.		The subsequent bullet points within the policy will also need to be updated.
SPS3	**Policy SPS3 – Bertie Place Recreation Ground** General comment NE welcome the recognition of potential impacts on the Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI. GI Network reference The site is identified as supporting GI (Policy G1(b)) and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network. Therefore, reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.	General comment General comment noted. GI Network reference To overcome this objection to the plan and to provide internal consistency for the policies themselves, some policy wording is suggested. This is in the form of an additional bullet point proposed to be added to Policy SPS3 under the **Open Space, Nature and Flood Risk** heading.	General comment No change proposed GI Network reference Additional bullet point proposed to be added to Policy SPS3 under the **Open Space, Nature and Flood Risk** heading. *f) The site is identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss.* The subsequent bullet points within the policy will also need to be updated to reflect this wording.
SPS8	**Policy SPS8: Land at Meadow Lane** General comment NE welcome the recognition of potential impacts on the Iffley Meadows SSSI and the requirement for	General comment General comment noted.	General comment No change proposed

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Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	hydrological assessment and SuDS features due to this site's proximity to the SSSI. Watercourse buffer NE encourages the City Council to identify the requirement for a buffer strip to be put in place of at least 10m from the watercourse to the west of the site as per Policy G2 to ensure that this is clear within the allocation policy. GI Network reference The site is identified as supporting GI (Policy G1(b)) and is in close proximity to the SSSI, with a likely high biodiversity value particularly in relation to the invertebrate interest present which will contribute to the strengthening and enhancement of the ecological network. Therefore, reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.	Watercourse buffer Policy SPS8 already includes reference to the retention of a buffer along the watercourse. We propose a modification to make it clear that that bullet point g) makes reference to Policy G2. GI Network reference To overcome this objection to the plan and to provide internal consistency for the policies themselves, some policy wording is suggested. This is in the form of an additional bullet point proposed to be added to Policy SPS3 under the **Open Space, Nature and Flood Risk** heading.	Watercourse buffer We propose a modification to make it clear that that bullet point g) makes reference to Policy G2, as follows: *g) A buffer should be retained along the watercourse (**Policy G2**).* GI Network reference We propose an additional bullet point to be added to Policy SPS3 under the **Open Space, Nature and Flood Risk** heading: *h) The site is identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss.* The subsequent bullet points within the policy will need updating.
SPS14	**Policy SPS14: Redbridge Paddock** General comment NE welcome the recognition of potential impacts on the Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI. GI Network reference	General comment General comment noted. GI Network reference Paragraph b) of this policy already includes a reference to supporting GI. Paragraph a) of this policy already sets out that the site falls within the impact risk zone for the Iffley Meadows	General comment No changes proposed GI Network reference No changes proposed Fragmentation of linkages No changes proposed

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Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	The site is identified as supporting GI (Policy G1(b)) and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network. Therefore, reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network. Fragmentation of linkages Due to the potential high biodiversity value of this site and potential for fragmentation of linkages impacting on the SSSI, further information should be provided to evidence whether this is deliverable.	SSSI and includes appropriate wording to ensure no adverse impacts on the SSSI. Fragmentation of linkages In relation to the point about potential fragmentation impacts, the Council has reviewed this further and consider that if a proposal were to meaningfully retain a green buffer (including mature trees) and protect the river corridor/riparian corridor as the policy sets out, then the connectivity through the landscape would be preserved and this would mitigate any potential fragmentation impacts on the SSSI. The Council has reviewed the wording of the allocation in response to NE's concern and consider that the above is addressed via the current wording in bullet points d) and e) of the policy which sets out the importance of considering the SSSI and the retention of a green watercourse buffer in accordance with Policy G2.	
SPE1	**Policy SPE1: Churchill Hospital** General comment The above allocation falls within the Lye Valley SSSI Impact Risk Zone. The Lye Valley SSSI is a lowland fen spring fed system and is highly sensitive to changes in water quantity and quality. We welcome wording within the policy which states planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI.	General comment General comment noted. Urban Greening Factor The UGF policy is a new approach for Oxford, and the targets we have set are informed by previous testing and what we felt would be most achievable across the city to secure a range of benefits. In relation to the Lye Valley area, The JBA Hydrogeological Study sets out the complex nature of the catchment and the different risks that apply in different areas. It is likely that bespoke, specific mitigation measures will be required to address	General comment No change proposed Urban Greening Factor No change proposed

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Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	Urban Greening Factor NE encourages the City Council to be ambitious, particularly for those allocations which adjoin the Lye Valley SSSI. NE suggests, for site allocations adjoining the Lye Valley SSSI, a higher minimum target score for the Urban Greening Factor (set out in Policy G3), is considered. This is due to the increased importance in this area for natural surface coverage which in turn, ensures that the hydrological processes on which Lye Valley SSSI depends, are maintained.	particular surface and groundwater quantity and quality issues that may arise from development proposals. This will depend on what development is proposed and where within the locally identified IRZs for Lye Valley. Our concern, given the sensitivities of the habitats within the Lye Valley, is that setting a higher UGF target for this area could undermine the findings of the study or suggest that this is sufficient mitigation for impacts from development near by. In actuality, any measures required to mitigate the impacts on the SSSI should be specifically informed by the guidance in the site allocations and the Technical Advice Note (which builds on the recommendations of the JBA study) and carried out for that purpose. This may include higher levels of natural surface cover, but there may be other interventions/design choices which are also just as important (or more so), depending on what is proposed.	
SPE18	**Policy SPE18: Warneford Hospital** GI Network reference Policy SPE18 Warneford Hospital contains pockets of G1B green infrastructure as identified in the protected network and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network, therefore reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network Policy G1b should be referenced in policy	GI Network reference Criteria b) of Policy SPE18 already includes the following which addresses NE's objection: *... Losses of open space identified as supporting green infrastructure (Policy G1) will also need to be mitigated through enhancement of remaining GI. These requirements could be met in different ways, such as through enhancement of remaining areas of amenity grassland, additional planting such as new trees that can enhance canopy cover and the setting of the listed buildings, or improvements in linkages to nearby habitat, as well as new habitat creation.*	GI Network reference No change proposed

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
SPE4	**Policy SPE4: Jesus College Sports Area** GI Network reference This allocation in its entirety is part of the protected G1B green infrastructure network therefore reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network. Policy G1b should be referenced in policy	GI Network reference Criteria a) of policy already includes the following text which addresses NE's objection: *The entirety of both sites has been identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss. This enhancement could be addressed in different ways, such as through qualitative improvements to remaining on-site, and adjacent, areas of open space by improving the functionality of these spaces in terms of wider benefits they provide people and species.*	GI Network reference No change proposed
HRA	**Habitat Regulations Assessment** HRA Natural England agree with the conclusions presented in the HRA that there will be no Likely Significant Effects as a result of the plan on the Oxford Meadows Special Area of Conservation (SAC) in terms of water quality or recreational disturbance. Provided you have followed the advice set out within Annex A regarding the assessment of air quality, we can also agree with the conclusion of no LSE set out in the HRA in relation to air quality impacts.	HRA The City Council is pleased that NE agree with the HRA conclusions relating to water (quality and quantity) and recreational disturbance. Having reviewed the advice set out in "Annex A", regarding air quality assessment, the City Council is confident that the assessment undertaken in relation to air quality impacts has followed this advice.	HRA No further work required/ no changes need to the Plan.

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Historic England

Policy/section	Summary of HE Reg 19 comment	HE Reg 19 suggested change	Oxford City Council response/proposed modification
Policy S2: High Quality Design	Policy is considered sound - support reference to the role of heritage in the Council's strategic approach to high quality design.	N/A	Support is noted thanks, no further action proposed.
Policy E1: Employment Strategy	HE retain concern about first paragraph on new employment generating uses because this now includes broad reference to sites within the city centre. Would prefer a qualifier indicating that intensification and modernisation may need to be handled sensitively for some sites. Suggest adding "appropriate". Alternative would be a reference to other relevant policies in the plan	Amendments to wording as follows: *Planning permission will be granted for the appropriate intensification and modernisation of any Key Employment Site or any employment site in the city centre or district centre.*	Whilst we appreciate the concern, the qualifier does not in practice add any additional specificity without defining what we mean by 'appropriate', which will of course vary depending on site context. The policies of the Local Plan need to be read as a whole and other policies of the Local Plan, such as the detail covered throughout chapter 6 should ensure that any intensification/ modernisation is appropriate for the location, including ensuring that any harm to nearby sensitive features is avoided/mitigated through careful design choices. We do not currently propose any further modifications in relation to this comment.
Policy R3: retro-fitting existing buildings	Policy is considered sound – HE support this policy, making clear that traditional buildings require a different approach to retrofit measures when compared with adapting modern buildings to improve their carbon and energy efficiency.	N/A	Support is noted thanks, no further action proposed.
Policy HD3: designated heritage assets	1. The Reg 19 Local Plan switches terminology to refer to a heritage statement rather than heritage assessment (in previous iterations). HE consider that reference to heritage	Amendments to wording, corresponding to the 3 points made: 1. Policy should reference heritage assessment rather than heritage statement.	We are happy to agree to the first two points and the modifications suggested by HE as follows: 1. **Mod proposed to amend references from heritage statement to heritage assessment throughout the Local Plan (affects multiple policies e.g. HD3, HD4 and HD5).**

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	assessment more accurately reflects the subsequent policy requirement and the direction of travel through the draft NPPF consultation 2026. 2. Strongly recommend that the potential for proposals to enhance significance and its appreciation is incorporated into the policy wording. The potential for proposals to deliver other heritage benefits could effectively be incorporated into criterion c. 3. There is no subsection to the policy on scheduled monuments, which is an unnecessary omission that should be rectified. HE suggest additional text for inclusion.	*2.* Amend to criterion b) as follows: *That the development of the proposal and its design process have been informed by an understanding of the significance of the heritage asset including its setting, that enhancements to significance and its appreciation have been identified where possible, and that harm to its significance has been avoided....* Amend to criterion c) as follows: ...*and that measures are incorporated into the proposal that mitigate or reduce the harm where appropriate and/or deliver other heritage benefits.* 3. Additional policy sub-section addressing considerations for Scheduled Monuments and nationally significant Archaeology – see Reg 19 response for suggested wording.	**2. Mods proposed to criteria b) and c) as per the suggestions.** **3.** Whilst we note the concern about the omission of reference to scheduled monuments in the policy, we would draw your attention to the fact these are referenced in supporting text. Within the policy wording itself, we have tried to focus only on locally specific considerations that do not repeat national policy, but at present, we are struggling to see how the additional wording suggested aligns with this approach. For example, criteria c and d seem to repeat NPPF tests. Equally, within proposed criteria c, the wording about non-designated assets seems to repeat footnote 75 of NPPF (and is already covered at end of HD4). Nevertheless, further to our catch up, we think we could propose a modification that would bring attention to scheduled monuments and cross reference to policy HD5. **Modification adding some additional wording to the policy as follows:** *Specific considerations for scheduled monuments* *Proposals within the site or setting of scheduled monuments should consider the potential for non-designated heritage assets of archaeological interest, which could be of demonstrably equivalent significance to scheduled monuments. Where present, impacts on these assets will need to be addressed in line with the requirements of Policy HD5 and the NPPF.*
Policy HD4: Non-designated heritage assets	Proposed amendment to policy cross reference.	Reference should be made to HD3 rather than HD4 in the final line.	Agree, this is an erroneous reference. **Mod proposed to update cross reference from HD4 to HD3 in final para of policy.**
Policy HD5: Archaeology	Proposed amendment to policy cross reference.	Reference should be made to HD3 rather than HD2 and HD4.	Agree, these are erroneous references. **Mod proposed to update cross references as follows:**

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			Proposals which would or may affect archaeological deposits or features that are designated heritage assets will be considered against the requirements of Policy HD3~~relevant policy approach (Draft Policy HD2 Listed Buildings, Draft Policy HD4 Scheduled Monuments).~~
Policy HD6: Views and building heights	Support for the policy as worded.	N/A	Support is noted thanks, no further action proposed.
Policy NEOAOF: Northern Edge of Oxford Area of Focus	Proposed amendment to policy cross reference.	Reference should be made to HD6 rather than HD9.	Agree, this is an erroneous reference. **Mod proposed to update cross reference from HD9 to HD6 under criterion g) of the policy as follows:** *Development proposals should be developed in accordance with Policy ~~HD9~~HD6 and where applicable with the site-specific allocation.*
Policy SPN3: Oxford North Remaining Phases AND VARIOUS OTHER POLICIES	Check policy cross references. Policy SPN1 includes reference to impacts on conservation areas with a cross-reference to HD3. Here, in policy SPN3 they are referenced in the context of HD1. In policy SPS9 reference is made to both HD1 and HD3.	We recommend checking that the Council is comfortable the correct policies are being cited on when considering impacts on the character of conservation areas, in this and other site allocations.	Agree, there are some erroneous references here. **Mods proposed to correct the cross references in the following policies:** - **SPN3 (HD1 to be changed to HD3 in criterion h)** - **SPS9 (HD1 ref to be removed from criterion g)**
Policy SPN5: Pear Tree Farm	Reference is made to the need for further archaeological investigation only for any "sizable redevelopment". The meaning is unclear and open to interpretation. Harm to archaeological assets is not necessarily dependent on the size of the development, but its location. A small development in a location that contains important remains will lead to harm.	The wording here needs to be reviewed by the Council's archaeological adviser and revised.	Agree this wording is unhelpful. **Mod proposed as follows:** n) *This area is of archaeological interest for potential prehistoric and Roman remains, which will require further investigation as part of any ~~sizable~~ redevelopment **(Policy HD5).***

Policy CBLAOF: Cowley Branch Line area of focus	We note the different criteria that were included in the OLP2040 Regulation 19 have been dropped, presumably because of the more detailed work that has been done that is embedded in the CBL Densification Study. We look forward to the publication of that study. We highlight that impact on views and heritage significance connect with views towards the historic core, not just from the core.	Reference should be made to HD6 rather than HD9. h) Careful consideration given to the design and height of new buildings to ensure that their impact does not have a detrimental impact upon views from or to the historic core, or on surrounding low-rise residential areas. Development proposals should be developed in accordance with Policy HD69 and the site-specific allocation, where applicable ...	Agree with suggested amends. **Mods to be proposed as follows:** *h) Careful consideration given to the design and height of new buildings to ensure that their impact does not have a detrimental impact upon views from, or to, the historic core, or on surrounding low-rise residential areas. Development proposals should be developed in accordance with Policy HD9HD6 and the site-specific allocation...*
Policy SPS2: ARC Oxford	Proposed policy cross reference	The site allocation policy in OLP2024 Regulation 19 refers to the consideration of impacts within the setting of the adjacent conservation area and listed building (HD1 and HD2). These considerations remain relevant and should be reinstated with a reference to policy HD3.	**Propose a mod to add a new criterion under the Urban Design and Heritage section, before the current criterion g) relating to archaeological remains, to read as follows:** *g) Proposals should be designed in a way that is sensitive to the nearby listed building, as well as the Temple Cowley Conservation Area which lies adjacent to the site, particularly regarding heights, massing, roofscape and impacts on local character and street scene (**Policy HD3**).* **Letters for criteria that follow will need to be updated to account for new one added.**
Policy SPS6: Former Iffley Mead Playing Field	Reference is made to any sizable development requiring pre-determination evaluation.	This wording should be reviewed by the Council's archaeological adviser.	Agree this wording is unhelpful. **Mod proposed as follows:** *e) Proposals should ensure that the archaeological assets are appropriately investigated and responded to **(Policy HD5)**. Any sizable development will require pre-determination evaluation (geophysical survey and trenching).*
Policy SPS7: Kassam Stadium	Support for the policy as worded/	N/A	Support is noted thanks, no further action proposed.

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Policy SPS10: MINI Plant Oxford	The policy omits reference to HD6 and the CBL Densification Study. While reference is made to blending into surrounding views, the policy needs to connect with both the relevant policy and the 2025 study.	Reference should be made to the CBL Densification Study and HD6	We will propose a mod adding in a reference to the CBL study and High Buildings TAN, however, we do not propose to add a cross-ref to HD6 as this is only flagged in allocations explicitly where there are particular concerns in relation to protected view cones. Whilst HD6 may be of relevance to applications elsewhere in the city, this does not need to be repeated throughout all allocations as the Local Plan's policies need to be read as a whole. **Mod to be proposed to criterion e) as follows:** *e) Whilst there are limited constraints on the site, considerations around heights, scale and massing should factor in how the developments will be viewed from afar and on the approach, so as to reduce feelings of overbearing and dominating of the adjacent streetscape. Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025). Variations in materials, including selection of materials and how they are placed, could help to add visual interest to frontages and reduce homogeneity particularly when experienced from outside the site.*
Policy SPS11: Overflow Car Park at Kassam Stadium		Reference should be made to the CBL Densification Study and HD6	We will propose a mod adding in a reference to the CBL study and High Buildings TAN, please see comment against SPS10 explaining why we do not propose to include a cross-ref to HD6 also. **Mod to be proposed as follows:** *h) There is greatest potential for higher and larger plot buildings in front of the railway embankment and in the centre of the site, building in height from the outer edges towards the centre and north of the site. Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).*

Policy SPS12: Oxford Science Park		1. Reference should be made to policy HD6 to align with the approach elsewhere in the plan. 2. The allocation should make clear the importance of avoiding harm to any buried remains of Littlemore Priory discovered within the Science Park. 3. Suggest avoiding the implication that proposals should preserve the setting of the Farmhouse, when its significance has been harmed by development within its setting. It would be more appropriate to require proposals to "enhance" the setting.	1. Please see comment against SPS10 explaining why we do not propose to include a cross-ref to HD6. 2. Policy criterion k) does flag the potential for remains associated with Littlemore Priory and cross refers to policy HD5, which we feel addresses that part of your comment sufficiently. **3. We are happy to propose a mod to criterion j as follows:** *j) Development proposals must be designed to preserve and enhance the setting of the adjoining Grade II* listed Minchery Farmhouse, particularly plots in the east of the site **(Policy HD3)**.*
Policy SPS13: Ozone Leisure Park and Minchery Farmhouse	Welcome the newly drawn boundaries for this site.	The allocation should make clear the importance of avoiding harm to the buried remains of Littlemore Priory. Similar to agreed mods on LP2040, encourage that focus to be integrated within policy SPS13, with potential revised wording as follows: "The heritage significance of Littlemore Priory should inform the design of schemes including avoiding harm to buried remains and seeking opportunities to better reveal and appreciate the significance of those remains".	We agree some additional detail would be helpful and propose to use similar wording to that of SPS12. **We propose a mod to amend criterion J as follows:** *j) ~~Archaeological potential will need to be explored as part of any proposed redevelopment (Policy HD5).~~ Development proposals must take into consideration the potential presence of Medieval and Roman archaeological remains and remains of Littlemore Priory. Proposals should ensure that the archaeological assets are appropriately investigated and responded to **(Policy HD5)**.* **We also propose a mod to the 'Notable Heritage Assets' line in the summary box above the policy as follows:** *Contains Minchery Farmhouse Grade II* listed building. Potential for prehistoric, Roman and*

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			medieval archaeology, including remains associated with Littlemore Priory.
Policy SPS15: Sandy Lane Recreation Ground Policy SPS16: Templars Square Policy SPS17: Unipart Site		We recommend referring to the CBL Densification Study (all three sites) and policy HD6 (SPS15 and SPS17).	We will propose mods adding in references to the CBL study and High Buildings TAN, please see comment against SPS10 explaining why we do not propose to include a cross-ref to HD6 for SPS15 and SPS17. **Mods to be proposed as follows:** **SPS15 – Sandy Lane – Amend to criterion i) as follows:** *i) Whilst the site is in an area of the city with fewer constraints or less sensitivity in terms of views, development proposals will need to consider and mitigate impacts on the sensitive skyline and surrounding area, particularly when viewed in combination with existing and planned development on adjacent sites. This could be achieved in various ways, such as by avoiding built forms with excessively overbearing scale or massing and avoiding roofscapes that are excessively uniform. Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).* **SPS16 – Templars Square – Amend to criterion g) as follows:** *g) Because of the position of the site on a ridge in an elevated position relative to the city core, there is potential for development to alter views from and to the Historic Core Area (both in the foreground and background of views). Therefore, the townscape and visual impact of any development on views to, across and from the Historic Core Area must be understood, described and explained thoroughly, including with a Visual Impact Assessment, in compliance with Policy HD6. Heights should also be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).*

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			SPS17 – Unipart Site – New criterion to be added under Urban Design and Heritage section after existing criterion i), (and criteria after to be re-lettered), as follows: *j) Building heights should also be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).*
Policy SPE3: Government Buildings and Harcourt House		Reference should be made to the Headington Hill and St Clements Conservation Areas, as included in the OLP2040 Regulation 19	We have sought to list the key assets of relevance, including these conservation areas, in the info box above the policy box. **However, we will propose the following mod:** *g) Proposals must be designed to be sensitive to their impacts on the significance and setting of the nationally listed and locally listed heritage assets on site and adjacent to it, such as the Headington Hill and St Clements Conservation Areas, taking opportunities to enhance these wherever possible* ***(Policy HD3)****.*
Policy SPE6: Land surrounding St Clement's Church	Allocation is considered **unsound**. Unlikely to be effective due to its vague approach to heritage considerations and inconsistent with national policy (NPPF paragraph 203), failing to represent a positive strategy for the historic environment. The policy refers in criterion j) to the need to consider impacts on the significance of "the heritage assets listed [sic] above". This is un-necessarily vague and is open to interpretation, undermining a suitable approach to development in what is a sensitive site. Also, we note the assets referenced (presumably in	While the policy does provide a welcome steer towards limiting heights, we still recommend a cross reference to policy HD6 (noting the site intersects with a view cone). Wording changes would address our soundness concerns on this policy, making clearer the heritage considerations that need to be taken into account for this allocation.	**Mod proposed to the summary info box above the policy, in the notable heritage assets section, as follows:** *Site surrounds Grade II* listed St Clement's Church. Southern half of the site within South Park View Cone. Within St Clement's and Iffley Road Conservation Area and within setting of Headington Hill Conservation Area. The Grade I Registered Park and Garden Magdalen College lies adjacent to the site.* Current criterion n) reflects the additional specificity which we think would address your concerns relating to criterion j). **We propose a mod to correct the typo in criterion j), and then to remove and incorporate criterion n) into criterion j).**

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	"Notable heritage assets") do not refer to the adjacent Grade I Registered Park and Garden.		*j) Development proposals should be designed with consideration of their impacts on the significance of the heritage assets ~~ilisted~~ listed above (**Policy HD3**). Buildings should be arranged in a way that maintains the openness of the riverside setting, that does not compete with the Grade II* listed St. Clement's Church, and is sensitive to the adjacent Registered Park and Garden. Proposals should also maintain the hedge and treeline on the Marston Road and the avenue of trees south of the church that screen it and contribute strongly to the character of its setting.* We agree additional reference to the view cone and to HD6 would be useful, and **propose a mod to current criterion l) as follows**: *...Heights should drop towards the Cherwell, to be sympathetic to the relatively rural setting of the river and will also need to be designed with consideration for the view cone which passes through the site (**Policy HD6**). The green screening...*
Policy SPE11: Oxford Brookes Marston Road Campus	Given the reference to the OHAR in criterion g, it's appropriate surely to cross-refer to HD4?		**Agreed, we propose a modification (which also inserts a missing apostrophe in first sentence) as follows:** *g) Design proposals should acknowledge the Milham Ford School building's status as a local landmark in a historic, social and physical sense. The OHAR designation report highlights the elements that are distinctive to the building and its significance which will be of relevance when addressing potential impacts on this non-designated heritage asset (**Policy HD4**).*
Policy SPE17: Union Street Car Park	The OLP 2040 Regulation 19 refers to the archaeological potential of the site (though incorporating 159 –161		**Proposed mod to add detail to the notable heritage assets section in summary box before policy as follows:**

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	Cowley Road). If there is archaeological potential for Union Street Car Park, this should be acknowledged in the policy with a reference to HD5.		*No designated buildings, spaces or structures on site. Site is within the Crescent Hall View Cone. Some potential for archaeological remains in the area related to former uses as a clay pit and brick yard and in relation to the Civil War Parliamentarian Line.* **Additional criterion to be added under urban design and heritage section as follows:** *XX) There is also the potential presence of archaeological assets on the site, including in relation to the Civil War Parliamentarian Line. Proposals should ensure that these are appropriately investigated and responded to (**Policy HD5**).* **Criteria after the new addition above will need to be re-lettered.**
Policy SPCW2: Botley Road Sites around Cripley Road including 110 River Hotel and Westgate Hotel	Allocation is considered **unsound**. Inconsistent with national policy. NPPF paragraph 202 acknowledges that heritage assets are an irreplaceable resource, but the policy is silent on the approach anticipated to the non-designated hotels and is missing reference to HD4. The table above the policy states that River Hotel and Westgate hotel are on the Oxford Heritage Asset Register (OHAR); yet the policy does not seek to conserve or enhance the heritage significance of these buildings, it simply requires development needing to understand the significance of the site and its surrounding context.	Ref needed to HD4 Potentially, criteria f and h could be combined. Wording changes would address our soundness concerns on this policy to make explicit the approach to redevelopment of these assets on the OHAR, conserving or enhancing their heritage significance.	**We propose the following modification:** *e) Development proposals should be designed with consideration of their impacts on the setting of the Osney Town Conservation Area **(Policy HD3)**, as well as the non-designated heritage assets identified on the OHAR (**Policy HD4**).* We agree that criteria f) and h) could be consolidated. **We propose mods to delete criterion h), and update letters of criteria after, and to update criterion f) so it incorporates what was in criterion h) as follows:** *f) The Boar's Hill view cone covers the entire site allocation. Proposals should be designed in a way that responds to this protected view. Additionally, proposed development that exceeds the height*

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			*stated in the High Buildings TAN may have an impact on the Historic Core Area and so will be required to provide an LVIA so that the full impacts can be understood and assessed (**Policy HD6**).*
Policy SPCW6: Manor Place	Allocation is considered **unsound**. Inconsistent with national policy. NPPF paragraph 202 acknowledges that heritage assets are an irreplaceable resource, but the policy is silent on key heritage considerations. It does not represent a positive strategy for the historic environment as worded (paragraph 203).	The policy omits reference to the adjacent RPG (Grade I) and the nearby listed buildings (which also include Grade I assets). We refer to the changes to policy agreed in our signed Statement of Common Ground; implementing those changes in full would address our soundness concerns on this policy.	These additional assets are all listed in the notable heritage assets part of the summary box above the policy, however, we agree that the policy criteria could be improved upon. **We propose the following mods:** *e) The hedged boundaries are an important characteristic of the area and should be retained, as should the mature trees and areas of trees in the northern and southern corners, helping retain the green, semi-rural character of the setting as well as screening the site and providing a buffer to the highly graded designated heritage assets within St Catherine's College.* *Urban Design and heritage* *f) ~~Development should seek to preserve the special character of the conservation area within which it lies~~ Development proposals must be designed with consideration of their impacts on the setting of the Central Conservation Area, the setting of the nearby listed buildings and views, and the setting of the two adjacent Registered Park and Gardens (**Policy HD3**). The size, alignment and design of any proposed development should take account of the importance of preserving the visual and physical connections between important, surviving, historic elements.* **We also, propose a mod to make the summary box, notable heritage assets clearer:** *...It is adjacent to Magdalen College Grade I Registered Park and Garden and the Landscape at St*

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			Catherine's College Grade I Registered Park and Garden....
Policy SPCW7: Nuffield Sites	Allocation is considered **unsound**. Inconsistent with national policy. NPPF paragraph 202 acknowledges that heritage assets are an irreplaceable resource, but the policy is silent on key heritage considerations and risks harm to the avoidable harm to the character of the conservation area. It does not represent a positive strategy for the historic environment as worded (paragraph 203). Concerns about the lack of clarity in the vision of what's proposed for these three sites, particularly the site south of St. Frideswide Square. All buildings south of St Frideswide's Square are identified as being positive contributors to the conservation area in the Central Conservation Area Appraisal. To include them broadly in site SPCW7 as proposed makes their future very uncertain. Wording of criterion h) is not as clear as it needs to be. Aside from the conservation area, what other designated heritage assets are being incorporated into the development? The supporting Heritage Impact Assessment does not engage in assessing the impacts on significance of relevant heritage assets,	An alternative approach that we believe could resolve our soundness concerns is to separate the site south of Frideswide Square into a separate allocation, which focuses principally on the reuse of assets and acknowledges that they all contribute positively to the conservation area. We would welcome the opportunity to work with the Council on the wording for such a policy. Combining this site with the other two Nuffield sites blurs key issues in an unhelpful way. This would leave the two other sites – the Island site and the car park – which could be grouped together, as they are already. We suggest the following alternative wording for the development of those two sites: "h) Development proposals should show how the design of the scheme has been influenced by and has considered the city's heritage. Proposals should demonstrate how they conserve or enhance the character of the conservation area (in accordance with HD3) and how the existing non-designated heritage assets such as the Royal Oxford Hotel, ~~can~~ will be incorporated into plans to redevelop the site (in accordance with HD4), or justify an alternative approach."	We disagree that the allocation would benefit from being split up, or that this is necessary for soundness; however, we would be happy to propose some further modification to the criteria of the policy in line with your suggestions, as per the below. **Modification to be proposed to criteria f) and h) under the urban design and heritage section of the policy as follows:** *f) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views **(Policy HD6).** In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Applications must be supported by a full assessment so that the full impacts can be understood and assessed.* *h) Development proposals should show how the design of the scheme has been influenced by and has considered the city's heritage. Proposals should demonstrate how they would conserve or enhance the character of the conservation area (**Policy HD3**) and how the existing designated and non-designated heritage assets, in particular the Royal Oxford Hotel and 18-26 Park End Street, would ~~can~~ be incorporated into plans to redevelop the site, or justify an alternative approach (**Policies HD3 and HD4**).*

	presumably because maximum flexibility is sought and there are no scheme designs to consider at this stage.	Furthermore, reference should be made to HD6 in criterion f.	
Policy SPCW8: Osney Mead	In our signed Statement of Common Ground (for Local Plan 2040 preparation), we agreed reference to "the setting of Osney Abbey Scheduled Monument (in accordance with policy HD4), including through design, interpretation and/or enhanced screening, and".	Recommend this agreed wording (modified to refer to HD3) is integrated.	Upon further reflection, we are unable to identify how development on the Osney Mead site can practically be expected to bring about enhancements to the setting of the scheduled monument. We have also now sought a view from a colleague in the heritage team on this matter and they are in agreement. As such, we do not propose to carry forward this wording.
Policy SPCW9: Oxford Railway Station and Becket St Car Park	Allocation is considered **unsound**. Not justified by proportionate evidence. Given the heritage sensitivity of this prominent location at a key entry point to the city, it is vital that the allocation is informed by adequate consideration of heritage impacts. Without such work, the allocation also does not represent a positive strategy for the historic environment (in accordance with paragraph 203).	To be sound, in our opinion, this allocation needs to be informed by heritage impact assessment, and the policy revised to take account of a better understanding of heritage significance and impacts on significance. Cross references are also needed to policies HD3, HD6 and potentially HD4.	We have reviewed and updated the 'South and east of Oxford Station' section of the Heritage Impact Assessment so that the area of assessment now incorporates the railway station area more explicitly, alongside the Nuffield Sites. This has highlighted a few extra details in relation to heritage sensitivity which we propose to incorporate into the summary box for the policy and the allocation's requirements. **Mods proposed to update the 'Notable Heritage Assets' section of the summary box before the policy to improve accuracy/clarity, as follows**: *The site is located within the Historic Core Area and within several view cones (in particular, Raleigh Park and Boar's Hill). The site is in close proximity to ~~contains~~ the Central (City and University) Conservation Area to the east, as well as the Scheduled Ancient Monuments of Rewley Abbey (predominantly below ground) and Swing Bridge at Sheepwash Channel. The site is within the setting of several Listed Buildings, including Church of St Thomas the Martyr (Grade II) (directly opposite to the east) and its surrounding churchyard and*

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			boundary walls, Combe House (Grade II) and St Thomas Vicarage (Grade II). There are also Oxford Heritage Asset Register (OHAR) assets nearby including the Former Castle Hotel (23 Park End Street), the Sheepwash Channel, and the Westgate Hotel (Botley Road). *The southern end of this plot extends into the precinct of Osney Abbey.* **Mods proposed to update the 'urban design and heritage' section with an additional criterion, (new criterion should slot in before the existing criterion j), and subsequent criteria re-lettered) to reflect the updates to the Heritage Impact Assessment, as follows:** *XX) Development proposals should be designed to avoid or mitigate their impacts on the significance and setting of the designated heritage assets nearby including the Central (University and City) Conservation Area, the various listed buildings, and scheduled monuments, as well as the non-designated heritage assets (**Policies HD3 and HD4**).* **Mod proposed to add in cross-reference to policy HD6 in criterion i), as follows:** *i) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views **(Policy HD6).** In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Prior to undertaking any landscape or visual assessment work (to support the masterplan-led approach, or development proposals), the key views should be discussed and agreed in advance in*

			writing with the City Council. A full assessment should accompany proposals so that the full impacts can be understood and assessed.
Policy SPCW12: West Wellington	Query the phrasing of criterion d. The site lies fully within the conservation area, so it would seem remiss not to refer to that explicitly. Is it possible to "incorporate" other designated heritage assets into the scheme? There are no other designated heritage assets within the site. We recommend rewording this criterion.		**We propose the following mod to criterion d):** *d) Development proposals should be designed with consideration for their impacts on the significance and setting of the conservation area and the nearby listed buildings ~~Proposals should demonstrate how the surrounding designated and non designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach~~* ***(Policy HD3)****.*

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Environment Agency

Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
Policy G2: Enhancement and Provision of New Green and Blue Features	1. The second bullet of the 'Policy Implementation' section refers to "embankments" which can cause confusion as it suggests a manmade raised bank top. Replace this word with "bank tops". 2. Box 4.1 misses the opportunity to strengthen the ecological connectivity provided by rivers – suggest additional wording. 3. Acknowledge that Policy G7 contains a statement on culverts but that is in the context of flood risk and it not being seen as a requirement for the benefit of ecology within the watercourse environment. This should be included as requirement of Policy G2. 4. As per point 2 above, the strengthening of the ecological connection provided by rivers should also be reflected in the wording of Policy G2. 5. Within the Policy, more emphasis should be placed on protecting blue corridors and more detail provided on where the ecological	Amendments to wording, corresponding to the five points made: 1. Amend bullet two as follows: *"…. seeks to facilitate opportunities to re-naturalise spaces near watercourses. This could mean thinking about ways to reinstate ~~embankments~~ bank tops by removing artificial materials and 're-wilding' them which can…."* 2. Amend paragraph entitled "Strengthening linkages between area to enhance network connectivity" as follows: *"by incorporating linear features like lines of trees/hedges, creating new pockets of green space that can form 'stepping stones' between larger spaces or taking opportunities to ecologically enhance river corridors and open up and enhance access to….."* 3. Amend Policy G2 to include the following requirement: *"Planning permission will only be granted for proposals which do not involve the culverting of watercourses, and which do not prejudice future opportunities for de-culverting. Opportunities for*	1. Agree that the wording to Policy G2 can be amended as requested in the suggested change by the EA. (See Main Modifications table for full amendment.) 2. Agree that the additional wording to the supporting text can be amended as requested in the suggested change by the EA. (See Main Modifications table for full amendment.) 3. The Council considers that Policy G7 clearly states the importance of not allowing culverting of open watercourses and that the supporting text of this policy highlights the ecological benefits of not allowing culverts. This does not need to be repeated in Policy G2. 4. Agree that the additional wording to Policy G2 can be amended as requested in the suggested change by the EA. (See Main Modifications table for full amendment.) 5. Agree that the additional wording to the following header within the policy: "*Opportunities to enhance and protect blue corridors*" can be amended as suggested by the EA. However, the Council considers it more appropriate to include the reference to where the ecological buffer zones should be measured from within the 'policy implementation' section of the supporting

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	buffer zone should be measured from.	*de-culverting of watercourses should be actively pursued as a valuable enhancement to rivers and streams."* 4. Amend bullet d of the Policy as follows: *"Where there is an opportunity to strengthen links between green spaces, particularly ecological sites, creating linkages with surrounding green infrastructure (e.g. by including lines of trees/hedges and river corridors to support linkages)".* *5.* After bullet j, the next header should be amended to: *"Opportunities to protect and enhance blue corridors."* Part of the text below this header should also be amended to: *"An ecological buffer zone of at least 10 metres (measured from the top of the bank) ~~with~~ should be retained, or if it is not already in place it should be reinstated where possible.*	text, rather than within the policy. (See Main Modifications table for full amendments.)
Policy G7: Flood Risk and Flood Risk Assessments	The EA are pleased to note that the two previous comments made against the Regulation 18 version of the Plan have been included/ updated in this version.	N/A	Support is noted – thank you. No further action proposed.

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
Policy G8: Sustainable Drainage Systems (SuDS)	Propose additional wording to policy to highlight that deep infiltration features are generally not supported.	Amend the end of the third paragraph of the policy as follows: *"Infiltration SuDS measures would not be encouraged in areas that have shallow groundwater as these measures would not be suitable. Deep infiltration features/soakaways are generally not endorsed and not considered to be SuDS."*	Do not consider that an amendment to the policy is required. An additional bullet to include some of this information would be more appropriate within the 'policy implementation' section of the supporting text. We are happy to include the first part of the sentence but do not think it is necessary to include *"and not considered to be SuDS"* because whilst these features may not be desirable, they could still generally be described as SuDS. (See Main Modifications table for full amendment.)
Policy R5: Water Resources and Quality	Generally support the Policy but would like it to show that new developments will not use non-mains drainage where connection to the public sewer is considered reasonable.	Amend Policy R5 to include the following requirement: *"The use of private sewage disposal facilities within publicly sewered areas will only be acceptable if the applicant can demonstrate that the additional cost of connecting to the sewer would be unreasonable, connection is not practically feasible, or the proposed private sewerage system would provide additional environmental benefits that would outweigh the potential environmental risks."*	**We are happy to propose a modification to add an additional requirement under the foul and surface water drainage section (in between the two existing paras) of the policy as follows:** *Proposed development should avoid utilising private wastewater drainage systems where a public sewer connection is available, unless the necessity of this can be robustly justified.* We suggest the justification requirement should be expanded upon in the policy implementation text above the policy. **We propose an additional bullet point to be added under policy implementation as follows:** • *Relying upon private wastewater drainage methods, such as septic tanks, introduces additional environmental risks as it will typically fall on the owner to ensure that they are appropriately maintained in future, in order to avoid wider contamination due to spills/leaks. Developments are therefore expected to connect into the public sewer system for*

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
			drainage of wastewater unless an alternative approach can be robustly justified, such as by showing that public sewer connection is unfeasible, or that there would be additional environmental benefits that would outweigh the potential environmental risks.
Policy I2: Safeguarding Land for Infrastructure (a - Oxford Flood Alleviation Scheme)	The EA are pleased that the Council has taken their advice about including a safeguarding policy in relation to the Oxford Flood Alleviation Scheme (OFAS) and that it is included in the Policies Map. The site boundaries of two of the allocations: Osney Mead and Redbridge Paddock lie adjacent to OFAS. It would therefore be beneficial if OFAS was referenced in these respective site allocation policies.	Amendments to Policy SPS14 (Redbridge Paddock) and Policy SPCW8 (Osney Mead) to include a reference to OFAS. To note- these sites are adjacent to the safeguarded area of the OFAS, but Redbridge Paddock is not directly adjacent to the proposed OFAS channel.	Agree that the reference to OFAS can be added as a new paragraph at the end of the "Open space, nature, flood risk" section of both site policies SPS14 (Redbridge Paddock) and SPCW8 (Osney Mead), as follows: *"Land safeguarded for OFAS is adjacent to the site (**Policy I2**)."* (See Main Modifications table for full amendments.)
SITES referred to but not in Reg 19 document	The EA has made various comments on the following 11 sites: • 1 Pullens Lane • 2 Harberton Mead • Bayards Hill Primary School Part Playing Fields • Clarendon Centre • Edge of Playing Fields, Oxford Academy • Land off Harolde Close • Old Road Campus	N/A	The Council has confirmed to the EA that these sites are not allocated in the Reg 19 version of the Plan, therefore the EA has agreed to withdraw all comments in relation to these sites.

Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	• Oriel College Sports Ground and adjoining land (comprising 263 and 639) • ROQ site • Oxford Stadium • Uni of Oxford Science Area & Keble Road		
Policy SPS1: 474 Cowley Road	29% (0.12ha) of the site is covered within fluvial flood extents. No proposed number of dwellings offered currently, so unable to confirm general allocation suitability regarding floodplain compensation concerns. Concerned with safe access/egress routes having to travel within FZ3a and flashy catchment. Updated modelling will also be required to confirm site suitability.	Require minimum number of dwellings for site to ascertain if floodplain compensation can be achieved on site. A more detailed review of the access/egress to the site will still need to be undertaken within a SFRA - these routes should be provided and avoid FZ3a.	The Level 2 SFRA considers that the main access to the site does lie within the design flood event and that a site-specific FRA would need to further investigate this and likely utilise updated modelling results for Boundary Brook. **We are happy to propose a modification to include an additional requirement (at the start of the final sentence of bullet d) under the open space, nature and flood risk section of the policy as follows:** *Updated modelling of Boundary Brook will also be required to inform a ~~A~~ site-specific FRA, which should also consider in more detail the nature of the surface water flood risk to determine how quickly it occurs and the degree of hazard on site.* In respect of the other points raised, a minimum number of dwellings expected on this site allocation (14) is provided in the policy. The Level 2 SFRA undertaken for this site highlights that development is possible as the majority of the site lies within Flood Zone 1 and outside the design flood extent (so floodplain compensation may not be necessary or minimal). In addition, the areas of high surface water flood risk mirror the fluvial

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
			flood extents. In this regard it should be possible to accommodate development at the site. The site allocation policy reflects the level of flood risk present at the site, particularly along the access and states that this should be considered in a site-specific FRA. We feel this is more appropriate as it is dependent on the design of the site which is unknown at this present time. Any development proposal would also have to meet the requirements of Policy G7 which addresses flood risk and FRAs and clearly sets out the criteria that need to be met before planning permission will be granted.
Policy SPCW11: St Thomas School and Osney Warehouse	Site is 0.41ha with 10 dwellings proposed (0.17ha). With 92% of the site being inundated during the design flood event, there is limited space on site outside of design flood event for suitable development/compensatory storage.	It is very unlikely that without substantial re-development that suitable floodplain compensation will be possible on this site, and without this, the site would be undevelopable. The policy should explicitly state that the development would need to not increase the footprint compared to the existing built footprint on site.	A site-specific FRA is required for this site which is located within Flood Zone 2 and currently contains development. It is made up of two parcels – one containing a former school building and the other the warehouse. The Level 2 SFRA does highlight that the parcel containing the former school is at more risk of flooding than the Osney warehouse parcel, therefore it would be expected that the more vulnerable part of the allocation, i.e. the dwellings would be located here. The site allocation policy reflects this and specifically states that a sequential approach should be taken to locating development on the site as well as highlighting that modelling will need to be undertaken to assess off-site impacts and compensatory requirements should ground raising need to be implemented. Furthermore, a significant part of each parcel already contains development, therefore it is unlikely that any new development will occupy a footprint larger than

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
			existing and therefore unlikely that compensation would be needed. The Council therefore considers that flood risk at this site has been addressed suitably in both the site allocation and flood risk policies and that no further action is required. We do not believe it necessary to include the point about not increasing the built footprint of the site in the allocation policy, as we consider that the requirements of Policy G7 already addresses this and explicitly states that proposed development should not increase flood risk elsewhere.
Policy SPS13: Ozone Leisure Park and Minchery Farmhouse	Further information is needed regarding proposed number of dwellings before confirming soundness. Large amount of space on site outside of fluvial flood extents, so expectation is that the sequential approach would have to be taken.	In order to address soundness points b and d, the number of dwellings must be confirmed and the LPA should set out that a sequential approach must be taken to site layout and ensure that development is outside the fluvial flood events.	This site is one of three sites that are linked and the relevant site allocation policies clearly state this. Policy SPS7 (Kassam Stadium) contains the minimum number of dwellings to be delivered (290) but there is flexibility to deliver across all three sites if required as long as the minimum number is achieved. All three site policies clearly state that a site-specific FRA is required and that a sequential approach must be taken to locating development on the site. This site allocation specifically states that "*development should avoid the areas of Flood Zone 3 along the brook and across the whole southwest corner,…"*. The Council therefore considers that flood risk at this site has been addressed suitably in both the site allocation and flood risk policies and that no further action is required.
Policy SPS7: Kassam Stadium	Updated modelling would be required to fully confirm suitability as we stated in our previous comments made on the level 2 SFRA.	Providing updated modelling and reflecting this in a Level 2 SFRA may overcome soundness points b and d.	As expressed for Policy SPS13 above, this site is one of three allocations that are linked. This allocation contains the minimum number of dwellings to be delivered (290) but there is flexibility to deliver across all three linked sites if

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
			required, as long as the minimum number is achieved. The allocation policy requires that a sequential approach must be taken to locating development on the site and specifically states that "*development should avoid the areas of Flood Zone 3 along the brook.*" The Council is aware that the EA's Flood Map for Planning was updated in March 2025 and contains both national flood information and local flood model outputs but that these do not contain updated modelling for the smaller watercourses in Oxford, such as for Boundary Brook, Littlemore Brook and Northfield Brook. The Council discussed with the SFRA consultants whether to update the models for these brooks in the Level 2 SFRA, balancing this against the cost and usefulness of the information the modelling was likely to present. On balance, and taking a proportionate approach, the Council determined that it wouldn't undertake further modelling for these brooks, due to the small number of allocations that would be affected but more importantly, it was considered that updated modelling of these brooks would not provide us with information that the Level 2 SFRA does not already consider. The Level 2 SFRA has indicated that this site is at low risk from fluvial (river) flooding but at moderate risk from all other sources including pluvial (surface water) flooding. Northfield Brook runs along the northern boundary of this site and based on the EA's updated RoFSW (Risk of Flooding from Surface Water) maps, it identified that that the surface water flood risk is concentrated around the southern section of the Kassam Stadium. Any site-specific SFRA undertaken will have to use the most up-to-date mapping

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
			available at the time, so this will also be flagged in any assessment and can be used to ensure that development, particularly more vulnerable development, is directed away from areas on the site that are at risk from any source of flooding. The Council therefore considers that the models for the watercourses such as Boundary Brook, Littlemore Brook and Northfield Brook do not need to be updated and that the risk has been identified in the Level 2 SFRA, especially from the surface water flood mapping, and that more detail will be available once a site-specific FRA is undertaken.
Policy SPCW7: Nuffield sites Land South of Frideswide Square (624)	Site is 0.26ha with 59 dwellings (0.98ha) proposed for the site. Currently this would far exceed the site for available space. 100% of the site falls within the design flood event levels, so there would be no room available for floodplain compensation as currently proposed. There is no confirmation of this approach being undertaken so far.	Need to ensure the number of dwellings proposed can be built on the existing footprint of the site because flood storage compensation for any increase in built footprint is not feasible on this site. The site is currently contrary to paragraph 181 of the NPPF which states that within the site, the most vulnerable development is located in areas of lowest flood risk, additionally that development must not increase flood risk elsewhere.	This parcel is one of three parcels (including the Island Site off Hythe Bridge Street, and Worcester Street Car Park and Public House) that forms this site allocation. The minimum allocation of 59 dwellings is across ALL three parcels, not just this one. The policy requires a site-specific FRA to be undertaken and states that *"a sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding."* This applies to all three parcels and the Level 2 SFRA clearly shows that a large part of the Worcester Street Car Park lies in Flood Zone 1, even accounting for climate change and that the area of highest surface water flood risk mirrors a similar area. In addition, most of the Island Site is already covered in built development, therefore there is an opportunity to significantly improve flood mitigation here as part of any redevelopment.

Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
Policy SPS12: Oxford Science Park	Would need confirmation regarding future use of land and modelling before we can confirm suitability. Available space on site for proposed allocation, but further information needed.	Must confirm the appropriate 'complementary uses' of the land and provide updated modelling to confirm the site's suitability for additional development to overcome the soundness issues. This is to ensure the development is located in appropriate areas and provides the necessary flood storage compensation if required, in line with paragraphs 170 and 174 of the NPPF which steers development away from high flood risk areas.	This is predominantly an employment site, where an element of residential would be supported and other complementary uses would be considered on their merits. The policy wording does state that *"parts of the site are Flood Zone 3b, mainly along the Brook, and a sequential approach should be taken to locating development on the site, with more vulnerable uses away from the highest flood risk."* Therefore, if an application were to come in for a more vulnerable use, such as housing, the FRA would have to demonstrate that it was sited in the lowest possible areas of flood risk within the site. This is possible as a large proportion of the site lies within Flood Zone 1 (accounting for climate change) and/ or not within an area of high surface water flood risk. It is not possible to provide more information on what will come forward as the policy provides some flexibility towards this, whilst being clear that housing would not be the predominant use on site.
Policy SPCW3: Canalside Land, Jericho	Concerned that there is insufficient space to deliver the proposed allocation without increasing flood risk elsewhere. We appreciate that the Level 2 SFRA discusses the use of the sequential approach to avoid placing new developments within FZ3b and ideally into areas of lowest flood risk in the first instance. However, 0.3 out of 0.5ha of the site is proposed to be used for development (dwellings). During the 1%+41% CC AEP design flood event, 78.3% of the site is inundated (0.39ha). In turn, there would be an	To address the soundness issues with this policy, the area of the site proposed for redevelopment would need to be reduced significantly to make suitable compensation possible. Alternatively, the existing footprint used. In this case the space available for flood storage compensation for any increase in footprint is limited and we have soundness concerns for the site's deliverability in accordance with paragraph 181 of the NPPF. Additionally, the correct climate change allowance of 41% should be	The Council acknowledges that this is a historical site where flood risk issues have become more complex over time, but also note that permission for a mixed-use scheme including residential development only recently lapsed in early 2026. This is a brownfield site where a large proportion of the site lies within Flood Zone 2, with the highest levels of flood risk more limited towards the western boundary of the site, adjacent to the Oxford canal. The site allocation does not contain a minimum number of dwellings and there is an opportunity to significantly improve the management of flood risk both on and off- site if the site is redeveloped. Much of the existing site

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	extremely limited amount of space available outside of the design flood event (0.11ha) to propose suitable level for level compensation that would mitigate the floodplain storage space lost by the new development. As it appears very unlikely to offer enough space on site to offer suitable compensation, we would object to this at the planning stage. It is unlikely that this allocation as proposed would be deliverable. The Level 2 SFRA mentions using a freeboard of 300mm above the 26% CC AEP event (57.6m AOD) to mitigate flood risk to the development, however, we would have expected the 41% CC AEP design flood event level of 57.75m AOD to have been used instead (so a minimum proposed level of 58.05m AOD). There are concerns regarding access and egress to the site. The site and surrounding area are heavily inundated during the design flood events, and safe access to and from the site appears to be limited.	used to assess the finished floor levels and a minimum 300mm freeboard imposed in addition to the design flood level (using 41% climate change allowance).	area comprises impermeable hardstanding and there is potential to provide suitable compensation on greenfield land immediately adjacent to the site. The Level 2 SFRA has identified the best route of egress which is predominantly flood free apart from a 50m section along Combe Road. The hazard rating along Combe Road is low as in this section, a maximum depth and velocity of 0.12m and 0.01 m/s is reached. In addition, the site falls within the River Thames catchment which is dominated by chalk. It has a has relatively slow river response times to storm events, being groundwater, rather than surface water dominated. This increases the time taken for inundation and for adequate warnings and preparation in an extreme flood event. The Level 2 SFRA assessed both scenarios using 26% and 41% climate change allowances to provide more detail on fluvial flooding. A site-specific FRA will provide more detail about the preferred finished floor levels at the time a planning application is submitted using the latest information. In conclusion, the Council believes that this site should still be allocated and that there will be opportunities to overcome the issues that have been raised by the EA. The allocation can make a positive contribution to Oxford's housing need, which already cannot be fully met within the city.
Policy SPS4: Cowley Marsh Depot	Concerned that the development proposed would be inappropriate at	The first soundness issue to be addressed is to clarify that there will	The Level 2 SFRA considers that the main access to the site does lie within the design flood event and

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	the current scale proposed. The site is 1.7ha, with an estimated 83 dwellings (1.4ha) proposed within it. 30% of the site (0.51ha) falls within FZ3b, and in turn it is very likely that some of this area would be required to be used for the dwellings at the current scales proposed. More vulnerable development within FZ3b would be considered inappropriate. There also appears to be very limited space on site outside of the design flood event which covers 58% (0.99ha) to undertake an appropriate amount of level for level compensation that would be required for any new developments within this area. In turn there would be a significant amount of floodplain capacity lost at this site and would be considered to increase flood risk to the surrounding areas. Due to the scale of proposed development and lack of space for suitable compensation, we would likely object to this at the planning stage. Updated modelling is required as the current assessment is based of New National Model (NNM) informed data, which is suitable for high level use but not for site-specific FRAs where the risk is so high.	be no development within FZ3b, as this would be contrary to the NPPF and Table 2 of the PPG. The second soundness issue to be addressed is the area on site suitable for level for level flood storage compensation. The lack of space for compensation could result in an increase in flood risk elsewhere, contrary to paragraph 181 of the NPPF. The third soundness issue to be addressed is for the correct modelling to be used. The final soundness issue to be addressed is to ensure safe access and egress from the site. Paragraph 181 (part e) of the NPPF states that safe access and egress routes must be included for development within Flood Zones 2 and 3. Overall, it is likely that the development proposed will need to be heavily reduced in scale.	that a site-specific FRA would need to further investigate this and likely utilise updated modelling results for Boundary Brook. **We are happy to propose a modification to include an additional requirement (within the second sentence of bullet f) under the open space, nature and flood risk section of the policy as follows:** *f) A sequential approach must be taken to locating development on the site. A site-specific Flood Risk Assessment (FRA) will be required which should be informed by updated modelling of Boundary Brook. The FRA should also investigate the flood risk the presence of the nearby culvert presents and identify…."* In respect of the other points raised, we have reconsidered the site capacity and believe that the same capacity can still be achieved with a slightly higher density on the site (70 dph instead of the previously assumed 60dph) which is still appropriate for that particular location and not located within FZ3b. The open space required on the site can be located within the areas of highest flood risk and there are opportunities on green space immediately to the rear of the site to provide flood storage compensation.

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	Concerns regarding access and egress to the site, as the surrounding area is heavily inundated.		
Policy SPCW7: Nuffield sites 70 - Island Site, Park End Street/Hythe Bridge Street	Concerns that there will not be sufficient space available on this site for development and not increase flood risk elsewhere. This site is 0.65ha in size and currently 59 dwellings (0.98ha) are proposed to be built. The Level 2 SFRA discusses a primary focus on re-developing the existing footprint to avoid the need for additional buildings. However, it appears unlikely considering the 59 new dwellings plus other mixed uses, would fall within the redevelopment area and we have no confirmation this would be the case. 85% (0.55ha) of the site falls within the design flood event extents, so it is very likely that level for level compensation will be required for any new developments within this area. Considering the scale of the works proposed, it appears difficult to accommodate all the development without the loss of floodplain storage area. In turn this development as proposed is likely to cause an increase in flood risk to the surrounding areas.	This development as proposed is likely to cause an increase in flood risk to the surrounding areas, contrary to paragraph 181 of the NPPF. We would need to see the scale reduced significantly and for compensation to be undertaken/possible before this site before we would consider it deliverable and compliant with national policy.	As per our earlier response in respect of Land South of Frideswide Square, we would like to reiterate that the Island Site is one of three parcels that forms this site allocation. The minimum allocation of 59 dwellings is across ALL three parcels, not just this one. The policy requires a site-specific FRA to be undertaken and states that *"a sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding."* This applies to all three parcels and the Level 2 SFRA clearly shows that a large part of the Worcester Street Car Park lies in Flood Zone 1, even accounting for climate change and that the area of highest surface water flood risk mirrors a similar area. In addition, most of this parcel, the Island Site is already covered in built development, therefore there is an opportunity to significantly improve flood mitigation here as part of any redevelopment.
Policy SPCW8: Osney Mead	The site is 17.8ha and considering the high portion of the site that falls	Confirmation on the total scale of the development at this stage is required	This allocation is a large and complex brownfield site involving several parties who have been

Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	within FZ3b (6.94ha or 39%), we have concerns that any proposed development within this area would be considered inappropriate (both less and more vulnerable). We appreciate that a sequential approach will be undertaken and that no development other than open space and/or water compatible development will be undertaken within FZ3b. Confirmation on the total scale of the development at this stage is required. Currently we have only been given the number of dwellings that are proposed within the site at 247 (4.12ha) while the development also includes mixed less vulnerable uses as well (scale n/a). 86% of the site lies within the design flood event (15.31ha). The proposed dwellings alone would exceed the remaining space available outside of this extent (4.12ha) and therefore there does not appear to be suitable space available on site to provide level for level compensation at the scale required to avoid a reduction in flood storage capacity. This would be considered to increase flood risk to the surrounding areas and therefore unacceptable at the	to confirm that no development will be within FZ3b and that development can be appropriately compensated for. As currently proposed, unless there is a significant reduction in the scale of development at this site, we will object to the proposal at the planning stage in line with paragraph 181 of the NPPF.	working together to bring it forward for redevelopment. Detailed design work has been undertaken and reviewed but it is an ongoing process. It is therefore not feasible at this stage to provide more detail in respect of the scale of the total development proposed. At present, this site is predominantly in employment use and suffers significantly from a lack of comprehensive flood risk mitigation across the whole site. Its redevelopment provides an opportunity to significantly improve the management of flood risk both on and off-site. The allocation policy states It is expected that "*a sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding, with car parks and other ancillary uses in higher risk areas where possible."* Any housing on site will therefore be sited in the areas of lowest flood risk on the site and given that it is likely to be student accommodation, this can be built at a higher density than perhaps the EA is anticipating. The Level 2 SFRA highlights that development is already present on the site and that during the 1.0% AEP + 26% climate change design event, the existing development is estimated to displace 10,200 m^3 cubed of water. Therefore, depending on its design, it's feasible that the redevelopment of the site could displace less than this amount of water, together with other opportunities to improve flood risk on site. The SFRA acknowledges that significant ground raising may be required due

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	planning stage (also does not consider the mixed use less vulnerable developments in that scale). Ground level raising may also be required to raise the development above the required design flood event finished floor level, which would again increase the amount of compensation required. Therefore, unless there is a significant reduction in the scale of development at this site, as currently proposed, we will object to the proposal at the planning stage.		to the amount of the site that would lie below the appropriate floor level but that would need to be assessed through as site-specific FRA once the quantum and design of the scheme is known.
Policy SPCW2: Botley Road Sites around Cripley Road including River Hotel and Westgate Hotel 613 - Sites adjacent to Osney Bridge	For the sites adjacent to Osney Bridge, concerned that there will not be enough space on site to deliver the proposed allocation without increasing flood risk elsewhere. The sites combined are 0.3ha in size and 20 dwellings are proposed across them at 0.33ha of space. Currently this would only leave 0.01ha available for flood waters/ compensation. The scale of development would therefore exceed the available space available on site outside of the design flood event and would not have suitable space to undertake appropriate level for level compensation to avoid increasing the flood risk to the	As currently proposed, it appears unlikely that this site will have suitable space to carry out the required amount of level for level compensation in accordance with paragraph 181 of the NPPF. Require confirmation of most of the site being re-developed with appropriate FFLs, and in turn a reduction in the scale of development with the design flood event for this site to be acceptable at the planning stage.	This site allocation comprises of the following three parcels: *3-15 Botley Road and The River Hotel – 0.34ha *Land to the South of Cripley Place – 0.31ha *Westgate Hotel, Botley Road and 3 - 7 Mill Street – 0.19ha with a total area of 0.84ha. All three parcels are predominantly brownfield sites that contain a mix of more vulnerable and less vulnerable uses. The site allocation policy states that *"a sequential approach should be taken to locating development on the site, with more vulnerable uses away from the highest flood risk."* Therefore, it is expected that the more vulnerable use of the mixed-use development such as the dwellings will be located in the areas of lowest flood risk within the allocation area. It is also considered that there is adequate room on site for the development to not

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	surrounding areas. Re-developments and new developments would also need to accommodate an appropriate Finished Floor Level (FFL) above the design flood event. The Level 2 SFRA discusses that most of the proposed development would be undertaken using the re-development of existing development and any new developments would be located within the areas of lowest flood risk. However, no final confirmation on how this will be split. 48% (0.16ha) of the site falls within the design flood event (of which is using the 26% when the 41% should be used for more vulnerable developments).		increase flood risk on and off-site, especially due to the amount of existing development. Apart from The River Hotel parcel (located to the north of Botley Road), the other sites predominantly lie within Flood Zone 2, (even accounting for climate change), so we believe the 26% climate change allowances were the correct ones to use for the Level 2 SFRA. A site-specific FRA can assess this and the floor levels in more detail once a planning application is submitted and the layout of the scheme is known.
SFRA	**Level 1 and 2 Strategic Flood Risk Assessment (SFRA):** In the most recent versions of the Level 1 and 2 SFRAs we note that no updates were made following our previous comments made on 5 December 2025. Therefore, many of our previous comments regarding the sites and general SFRA wording remains. We have therefore reattached these comments and have also provided further information for each SFRA below: **Level 1 SFRA:**		**Level 1 and 2 Strategic Flood Risk Assessment (SFRA)** - Updates were made to both the Level 1 and Level 2 SFRA reports after the 5th December. In particular, appendices 2 and 3 were added to the Level 2 SFRA report which addresses some of the previous comments made in earlier discussions prior to and after the Regulation 18 consultation. **Flood Zone 3b** - Appendix 3 of the Level 2 SFRA contains the data review for the Flood Map for Planning and Modelling Data Review. This also provides further explanation on the 3.3% AEP event and how it has been applied. For two of the site allocations – SPS1 (474 Cowley Road) and SPS4 (Cowley Marsh Depot), we have

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	We do still have some concerns with the Level 1 SFRA as currently proposed. We have provided additional comments for the sections we are concerned with and have also provided additional wording that could be used to inform and overcome our concerns. **Flood Zone 3b** – the definition provided has been updated to use the 3.3% AEP event from any detailed modelling, and then when this is not possible to undertake applicant modelling. We consider this acceptable. However, we previously requested that additional wording in the form of a definition is added to include a definition to cover the scenario where local detailed modelling is not available and needs to be undertaken. A precautionary approach would then need to be applied by using the FZ3 from the Flood Map for Planning (FmFP) as a proxy for FZ3b where local modelling is not available/feasible. **Cumulative impacts** – there is no section currently proposed to cover cumulative impacts apart from a brief coverage, within section 4.1. We were looking for a section to cover the potential cumulative impact of developments within Oxford City, particularly as many of		proposed a Main Modification seeking an amendment to ensure that any site-specific FRA submitted for those two sites is informed by updated modelling of Boundary Brook. (These two proposed modifications have been set out earlier in this Appendix.) **For all other site allocations (and relevant planning applications submitted), we are happy to propose a modification by adding a final bullet to the 'Policy Implementation' section of the supporting text of Policy G7 (Flood Risk and Flood Risk Assessments (FRAs)) as follows:** - *Site-specific Flood Risk Assessments should apply Flood Zone 3 from the Flood map for Planning as a proxy for Flood Zone 3b to ensure a precautionary approach is taken where local detailed modelling is not available or feasible.* **Cumulative impacts -** We think there is enough detail in both the relevant site allocation policies as well as Policy G7 as it is clear that flood risk cannot be increased either on or off site. **However, for clarity, we are happy to propose a modification to explicitly refer to level for level compensation at the end of the last sub-bullet of bullet three of the 'policy implementation' section of the supporting text as follows:** - *Thirdly, once avoidance has been fully explored, mitigation measures will be required, these could include:*

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	the proposed sites include works within the floodplain. This can include potential mitigation methods and approaches to offering floodplain compensation. We would emphasise the need for level for level compensation, as the main method of flood storage compensation. Cumulative impacts of voids could lead to significant losses in floodplain storage across Oxford City should these voids become blocked/silted and from impedance of flows from the supporting structures. **Site Specific FRA – Guidance** – There is lack of information to support applicants when completing their FRAs. The following bullet points cover more specific sections of concern. **Freeboards/Finished Floor Levels (FFLs)** – there is no section proposed to cover the requirements for FFLs/Freeboards within proposed developments. We are looking for minimum recommendations of suitable finished floor levels against the appropriate design flood event levels, i.e. expectation of 600mm above design flood event, with 300mm as the minimum recommendation. This is important		o *flood resistance measures (dry-proofing) e.g. barriers or raised floor levels to keep water out at times of flood;* o *flood resilience measures (wet-proofing) - using materials that can quickly dry out, helping buildings to be habitable again quickly;* o *Sustainable Drainage Systems (SuDS) to reduce surface water run off by slowing and storing water (see Policy G8); and* o *flood compensation measures e.g. creating new flood storage to mitigate any loss of storage through development (i.e. level for level should be the main method of flood storage compensation).* We consider that it is preferential for the modification to be made in the Local Plan rather than the SFRA. In terms of voids, national policy already does not support this approach, and we have not referred to it in the Policy G7 or the supporting text – no further action required. **Site Specific FRA – Guidance** – whilst we agree that there is a lack of guidance in the SFRA, this does repeat national guidance, therefore it will already be considered when applicants submit an FRA – no further action required. **Freeboards/Finished Floor Levels (FFLs)** – point noted but we feel this is already sufficiently covered in Policy G7 which was informed by national guidance – no further action required. **Floodplain compensation/storage – voids** – point noted but national policy and guidance doesn't

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	to ensure future developments are safe for their lifetime. **Floodplain compensation/storage – voids** – there are no sections covering floodplain compensation/storage requirements and the appropriate methods of providing floodplain compensation. We would recommend providing some wording regarding avoiding building new developments within the floodplain, but where this is not possible, floodplain compensation is undertaken to ensure available flood storage capacity is not lost. The compensation method should be level for level. Voids should be avoided, with additional wording to confirm this. Floodplain compensation/storage is another section that should be included as it will have a direct impact on the safety of not just the development but the surrounding area in terms of flood risk. We understand that this is site dependent, and in turn acknowledge the wording being shaped around the scale of the development. However, it is important to have a section which discusses this and should be included as it will be directly checked in consultation reviews.		support the creation of voids for flood storage, therefore we feel that this point is already covered, even if it is not explicitly stated in the Level 1 SFRA – no further action required. **Safe access/egress and emergency planning** – we consider that the individual Level 2 SFRAs have assessed the best route for each allocation, including the potential hazard of the route but that this would be explored in more detail in a site-specific FRA, particularly where updated modelling is required – no further action required. The Council agrees that some of these points raised in respect of the Level 1 SFRA could have been included as best practice. However, they do all already need to be considered as they form either part of the relevant national policy or guidance and to amend the SFRA would not fundamentally change any of the site allocations. If necessary, some of these details could be included in a Technical Advice Note (TAN) to assist applicants.

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	Safe access/egress and emergency planning – there is no direct section covering the issue of safe access and egress to and from proposed development sites and the information that should be used to support it. We would recommend in turn including a section that covers not just emergency planning (4.4) and flood warnings (2.4) but an additional section that includes the use of hazard ratings for sites where detailed modelling is available (or proxy alternates) to best inform the most suitable access/egress routes to and from the site. This again is another SFRA section that is covered during review and would be expected to at least be considered.		

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Sport England

Policy/ Para	Sport England summarised comments	Sport England suggested changes	Council response
C3	Policy C3 cannot be applied effectively to built sports facilities. A separate policy for protecting (and encouraging the improvement and new types of) these type facilities is needed. The emerging NPPF reaffirms that there is a separation between the policies for sport and recreational facilities and other types of community facilities. The policy also states that the location of new facilities must be 'easily accessible by walking, cycling and public transport' and 'not result in an unacceptable environmental impact or loss of amenity.' Often sports and community facilities are built on or adjacent to playing fields which will not be in town centre locations and may not be easily accessible by public transport. Also, strongly object to the paragraph in draft policy C3 [criteria d and e] that allows for the loss of sports facilities if there are other facilities in the area that can be enhanced or the proposal is for an alternative community facility for which there is greater need or demand. This does not comply with paragraph	A separate policy for indoor and built sports facilities should be developed in order to protect these from loss and support improvements to them. The new draft policy should be consistent with national planning policy. See paragraph 104 of the NPPF and our comments on G1.	Whilst Policy G1 protects outdoor spaces in many instances within the wider GI network (see also our responses under G1), Policy C3 addresses Use Class F.2, which covers a few types of indoor sports use that we can have some control over. It is acknowledged that it does not apply to the majority of indoor sports uses because most indoor sports facilities are within Use Class E. This is a very wide-ranging use class, but planning cannot distinguish between the various uses within it or control changes between uses within that Use Class. This limits what more the Local Plan, or an additional policy, can do unfortunately In relation to comments on criterion c, the purpose of this is to help ensure that replacement provision is not located in areas with less accessibility than that being lost. The Local Plan seeks to promote active and sustainable transport in the first instance. Whilst we accept that facilities can often be located away from town centre locations, we feel it is important to seek to secure

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	104 of the NPPF as sports facilities could be lost that are needed by the community for sport to other uses such as education and health. National planning policy does not permit this and it could allow more school and health buildings to be built on community sports sites.		accessible replacement provision that does not rely on private vehicle ownership this in the first instance and do not propose to amend this. In relation to criteria d and e, this covers a broader range of uses than just sports provision. When it comes to impacts on sports facilities, however, the NPPF tests would still apply as you point out, and it is not necessary to repeat these verbatim in the policy. It is also unlikely applicants are going to be able to demonstrate these are surplus to requirements in most incidences, thus we do not currently think there is justification for further modifying them.
C4	The policy must be clear that any playing fields on education sites (use class F1) are protected from development otherwise the policy is not compliant with national policy.	School playing fields should be protected from development and assessed against the relevant tests set out in national policy and Policy G1.	School playing fields are generally protected by the standards that schools need to follow, separate to the planning system. Loss of playing fields needs permission from the Secretary of State. Yet there may be cases where there is a surplus of space and use of part of a playing field for an alternative use could be justified and is beneficial. It is not considered necessary for the Local Plan to intervene in this.
G1	Whilst acknowledging that amendments have been made, it has still not been positively prepared. The	The policy and the plan do not plan any new sport and recreation facilities or identify new	*Comments in relation to finalising the PPS are addressed separately further down the table.*

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	Council has not completed its Playing Pitch Strategy and therefore does not have the evidence to inform Policy G1 and ensure that the requirements of NPPF para 103 are met, including that ancillary facilities, such as changing rooms, artificial pitches and sports courts and MUGAs on playing field sites are also protected from development. The Council is continuing to include playing field sites within the site allocations that Sports England continue to object to, rather than protecting them through policy as both the adopted and emerging NPPF require. Playing fields should be protected from development, change of use etc. Development should only be accepted where the tests in paragraph 104 of the NPPF are met. For example, we object to the words 'whether alternative sports might better suit the local community'. The policy provides no explanation of how this might be assessed.	opportunities to meet needs. Concerned that the plan is being brought forward without appropriate evidence being presented for review so we conclude that the Plan has not been positively prepared with regard to sports facilities. The Council should also update its strategy for built sports provision and there is no policy adequately protecting indoor sports facilities. The Council will need to complete the PPS to ensure that all playing fields and their ancillary facilities are correctly identified and these will then need to be recorded. The plan should include supportive policies for new sport facility developments e.g. - *Proposals for sport and recreation facilities will be encouraged and supported in line with other policies in the Plan and Sport England guidance.* - *The Council will seek to protect, maintain and where possible enhance existing open space, sport and recreation, play facilities and land including playing fields to ensure their*	In relation to protection of playing fields – the Council has sought to protect a significant number of playing fields through its protected green infrastructure network. These are typically protected as supporting GI (G1B spaces) as a minimum – which assigns the protections of the NPPF for open space as you set out, but also requires reprovision of any lost green infrastructure. It should be noted that, whilst the GI network is primarily made up of 'green' spaces, it can include other open spaces linked with recreation, including artificial surfaces. We would be happy to propose a modification to the glossary under the definition for green infrastructure to make this clearer in terms. **Modification to be proposed to the glossary as follows:** *Green Infrastructure: A network of spaces and features including parks, playing fields, woodland, allotments, private gardens, green roofs and walls, street trees. The term also incorporates 'blue infrastructure' such as streams, ponds, canals, and the rivers and can include other types of open space that contribute to*

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		continued contribution to the health and well-being of the community.' Proposals affecting sports facilities should be considered against the tests set out in the NPPF para 104.	*health and leisure, such as artificial pitches and play spaces for children/young people.* Additionally, we agree that some extra wording setting out our support for new sport and recreation facilities could be helpful and are happy to put forward a mod, though we would suggest a better place for it would be as part of Policy S1. **We propose the following mod to add an additional criterion under policy S1 as follows:** *To help achieve this it will aim to ensure development is located to: ...* *j) Support the health and wellbeing of local communities such as by delivering new sports and recreation facilities or enhancing existing provision.* The protection-related wording of your second proposed bullet is not considered necessary, as this is already carried out through Policy G1, C3 and the NPPF.
Evidence - PPS	More evidence is required for sport to consider the needs of the existing and new residents for existing, expanded and new sports facilities in Oxford. Tennis and padel should be included.	The Playing Pitch Strategy should be completed to inform the Local Plan and Infrastructure Delivery Plan. Tennis and padel also need to be covered within the Council's evidence base.	As soon as the Local Plan 2040 was withdrawn and we began working on the new Local Plan 2045, we identified the need for an updated Playing Pitch Strategy and have worked hard to commence this work as quickly as possible. Earlier

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	It is welcome that the Council is progressing a playing pitch strategy (although this should have been commissioned much earlier to properly inform the plan). However, strongly object to the inclusion of the KKP interim report Oxford City Playing Pitch Strategy Local Plan Interim report within the evidence base. This includes premature conclusions, (some of which Sports England disputes), as the data has not been checked and signed off by the national governing bodies, nor has the demand from all of the sports been assessed – e.g. Stage B has not yet been completed. Sport England is concerned that the emerging Playing Pitch Strategy is being used to justify a loss of playing field rather than providing an independent assessment of the need for playing pitches within Oxford City in line with Sport England's recommended methodology and the NPPF. The Playing Pitch Strategy is also required to inform the Council's Infrastructure Delivery Plan.	The interim report should not be relied upon as its findings are premature.	commissioning was not possible, and speeding up the work is equally impractical due to the seasonal nature of some survey work, as Sports England will be aware. The scope of the PPS work, including sports covered, was agreed with the steering group as part of the Stage A meeting, and Sport England were a part of this. As discussed in our catch up, it is not considered reasonable to have delayed preparation of the Local Plan entirely whilst waiting for the PPS to be finalised, we have however tried to ensure the preparation of the two documents are as aligned as possible and that emerging analysis is informing our approach as it emerges. The rationale for publishing the interim note was to share as much as we could to inform the Reg 19 consultation, whilst acknowledging that this picture can still change as the PPS continues to develop. **We intend to ensure the PPS informs future updates of the IDP (which is a live document) in due course.** In relation to concerns about the new PPS being used to justify losses in pitches, we strongly disagree. The city

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			is indeed under immense pressure to explore all areas of land for potential housing, including pitches, as is well documented. However, whilst securing more housing is an important objective of the Local Plan, another is to protect a network of green spaces for health and wellbeing, and this includes pitches. We see an updated PPS as not only an important tool in helping to identify current/future needs for pitches and associated facilities, but also in helping to justify the balance we are trying to strike in maximising land for housing whilst also protecting spaces like pitches through policies such as G1.
G2	The information that has been collected for the Council's new Playing Pitch Strategy (and as highlighted in its existing PPS) identify that there is a need to improve existing playing field and other sports facilities in Oxford City. For example, there are playing fields with in Oxford City that have no toilet facilities on site which can discourage women and girls from taking part in sport. Whilst Policy G2 mentions many other types of open space, it is silent on seeking to improve playing fields and	Please also see comments on Policy G1. The Council needs to complete its evidence base for sports facilities and update its policies accordingly, responding to the recommendations flowing from that work. As a minimum the policy text should include text to explain that the Council will protect, maintain and where possible enhance existing open space, sport and recreation, play facilities and land including playing fields to ensure their continued contribution to the health and well-being of the community.	Criteria b) of the policy sets out that one of the benefits applicants should seek to secure is *Health and wellbeing, including facilitating recreation and play for people of all age groups and abilities...* This would include improving formal and informal pitches as well as providing new or enhanced facilities that are intrinsic to the function of those spaces. **We are happy to propose a mod to make this clearer as follows:** *b) Health and wellbeing, including facilitating recreation and play for*

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	other sports facilities which does not accord with NPPF para 103.		*people of all age groups and abilities, particularly children and teenagers (e.g. play equipment, pitches and associated facilities);* It is acknowledged that the policy is covering a broad range of considerations. Our intention would be to bring forward a Technical Advice Note (TAN) that supports this policy. The Green Infrastructure and Biodiversity TAN could expand on various criteria in the policy such as this one and lay out various examples of how applicants might fulfil it including some additional focus on ways to improve associated sports facilities. As highlighted elsewhere in this table, we also intend to update our IDP as and when the PPS is finalised. This is where we can identify specific improvements to facilities that are needed of the plan period, based on the PPS findings. We can also continue to keep this updated where needs change in future as the IDP is intended to act as a live document.

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G6	Concerned about what this policy means for any playing fields or other sports facilities within these designated areas. It is not unusual for grass pitches to be located next to or within local wildlife sites (or similar designations). With reference to the playing pitch strategy and other documents that record playing fields and recreation facilities, the Council must carefully balance any new policies that could prevent Oxford's residents from enjoying the outdoors and keeping physically active. Often natural areas can benefit humans and nature so encouraging policies that support but must be given appropriate consideration in an urban environment.	Amendments are required to Policy G1 (please see other comments) or this policy to confirm that the City Council will support proposals for sport/rec, and that any proposals for new pavilions or improvements to existing sports facilities will be supported e.g. *Proposals for sport and recreation facilities will be encouraged and supported in line with other policies in the Plan and Sport England guidance'*	The comments here seem to be looking for a level of certainty in decision making which we are unable to be explicit about at plan-making stage. Particular issues in relation to biodiversity impacts or health and wellbeing, and which one weighs heavier than the other, will be different with every site and location. Policy G6 sets out a hierarchy of protection which aligns with the level of designation that different sites have in the city. Some of these protections exist regardless of the local plan (e.g. national designations), some are assigned through the Local Plan because sites have locally significant biodiversity value. Our proposed mod set out earlier to add to Policy S1 would introduce more explicit support for sport and recreation facilities, which we believe would respond to your concern here, however.
R8	Where new sports facilities are proposed this may mean additional traffic. But there is no explanation of 'unacceptable transport impact' is.	The plan does not acknowledge the benefits lighting can bring to active travel and outdoor sports facilities, or considers agent of change. This could be rectified with additional wording to acknowledge the benefits	The requirements of the policy are of relevance both to protecting the amenity of the new development (the occupiers) as well as the amenity of existing development nearby (communities and neighbours). It

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	Concerned that the policy applies to applications for sports lighting, yet the policy gives no acknowledgement of the benefits of outdoor sports lighting or street lighting to providing health communities. The policy strongly favours 'the amenity of communities, occupiers, neighbours and the natural environment' (see bullet point a). Not clear how the policy will be applied. The same applies for new outdoor sports facilities. The policy offers no context for applicants as to when a noise assessment will be needed, so it may be required for very minor planning applications. Sport England's planning guidance on 'Artificial Grass Pitches Acoustics Planning Implications may be helpful, though it needs updating. The agent of change principle also works the other way, for example, housing development should not be located near existing 'noisy' uses such as existing MUGAs, artificial pitch facilities or playing fields with sports lighting. There does not appear to be a policy that takes into account the themes of paragraph 200 of the NPPF so it is recommended that this is also developed.	that these types of proposals can bring to the health and wellbeing of the community.	does not favour one over the other and we have tried to make this clearer in response to your previous comments on the Reg 18 through the policy context bullets before the policy box. Therefore, the example you flag, about a proposal for housing being located near noisy uses, would engage these considerations, in the same way that a proposal for a 'noisy' use near an existing residential area would also. The supporting text also references the Agent of Change. The definition of what is an unacceptable transport impact will vary depending on the local context including what is proposed, what the current transport network is like etc. It is not possible to define what will be considered unacceptable at the plan-making stage. This is also true of requirements for noise assessment. **We would be happy to look at whether there is a way to incorporate some additional helpful guidance/considerations to assist applicants into the design checklist that sits in Appendix 1.1 if you think this would be helpful, though this will still need to be high-level.**

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			In relation to lighting, the policy needs to set out the broad considerations that may need to be factored into decisions when it comes to impacts on amenity. Considerations about appropriate levels of lighting for the needs of occupiers and the impact on neighbours are an important element of the design process regardless of what use is proposed. Of course, the needs of the proposed use are an important factor in helping to determine what is an appropriate level of lighting and we accept that a sports facility could have quite different needs than other uses. **Again, we would suggest that a good place to expand on considerations for lighting would be the design checklist in Appendix 1.1 of the Plan and we would be happy to propose something if you think this would be helpful?**
NEOAOF	Sport England objects to this policy text and advises amendments should be made to acknowledge the sport and recreation facilities within this area and their importance to the local community for sport. Sport England is concerned that the policy does not acknowledge that sports facilities are within the Area of Focus and does not include any requirements to protect	The policy should be updated to seek improvements to Five Mile Drive Recreation Ground, the Oxford University Press sports ground and other playing fields and sports facilities within this area of focus. For example, Five Mile Drive is an important site for youth football with improvements need to the quality of the pitches. In its current form Sport	In practice, each AoF covers a broad range of uses and we have not sought to acknowledge all of these exhaustively. Other overarching policies protect pitches (e.g. policy G1) and community facilities (e.g. policy C3). Relevant allocations within the AoF also set out their own specific requirements where proposals could impact a sports site.

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	them or improve them. Planning permission should not be granted for development that will affect existing sport and recreation facilities (including playing fields). The NPPF (paragraph 103 and 104) expects local authorities to set policies within their development plan that will protect and improve their open spaces, sport and recreation facilities regardless of ownership.	England considers the policy is not consistent with national policy and it is not justified or effective with regard to sport and recreation.	The AoF policy does not need to repeat these requirements as the Local Plan needs to be read as a whole. We don't agree that particular improvements to sites and facilities need to be identified through the AoF policies to be consistent with national policy. The need for enhancements to existing facilities is likely to change and evolve over the lifetime of the Local Plan. It will also need to be informed by the PPS (and future iterations). We would suggest the better place for identifying these needs is through the Infrastructure Delivery Plan – which is intended to be kept as a live document. As the PPS continues to emerge, we will ensure the IDP is updated to reflect any key improvements to facilities that are identified as part of future updates.
SPN4 OUP Sports Ground	This site is actively used by local community sports teams, including Oxford Cricket Club. It has a cricket pitch and 2 adult pitches. These community clubs will be displaced if this site is allocated for development. The Council has not completed its Playing Pitch Strategy and it cannot be concluded that this site is surplus to requirements, please see also Sport	This site allocation should be removed from the Plan.	This site has been allocated since the Sites and Housing Plan, and is a current allocation in the OLP36. For the new Local Plan, as part of our capacity assessment informing the minimum housing number for the allocation, we have assumed the retention of cricket onsite. The allocation then sets out clearly that:

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	England's comments on the evidence base. The proposal to develop a playing field is not consistent with national policy (paragraph 104) or the policies in the draft NPPF and is not justified.		*a) The capacity of the sports provision must be retained unless it can be demonstrated that it is surplus (which is not the case at the current time) or the loss of the sports provision can be otherwise compensated for (Policy G1).* We feel that the allocation as worded sets out an appropriate framework of requirements to ensure any potential impact arising from development on the sports uses of the site are fully considered and mitigated.
CBLAOF	This site area includes a number of sport and recreation facilities that are important to the local community. For example, the playing fields at Sandy Lane are still used by the local community (in spite of its allocation in the past Local Plan). The NPPF (paragraph 103 and 104) expects local authorities to set policies within their development plan that will protect and improve their open spaces, sport and recreation facilities regardless of ownership. Sport England considers the policy is not consistent with national policy and it is not justified or effective with regard to sport and recreation.	The policy should be updated to seek improvements to the playing fields and sports facilities within this area. The policy mentions seeking new public open space but instead the Council should consider identifying within the plan those existing open spaces. Infrastructure contributions should be collected to improve these existing community spaces.	Please see our response above, against your comments on NEOAOF, which is of relevance to these comments also. In relation to Sandy Lane specifically, the allocation sets out expectations for how impacts on the existing pitches should be approached and these do not need to be repeated in the broader AoF.
SPS4 Cowley Marsh Depot	Sport England requests amendments are made to this policy to protect use of adjacent community playing field.	The following wording is suggested; 'The adjacent site is used for sport including cricket. The proposed	The adjacent green space to the north is protected as core green infrastructure under Policy G1

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		development (including proposals for connection to the adjacent recreation ground) support the continued use of the site for sport. Appropriate mitigation (such as ball stop fencing) should be provided to ensure use of the site for cricket can continue.'	already, which affords a high-level of protection to the green space. Policy discusses the adjacent cowley marsh rec ground but **further mods could be made to criterion b as follows**: *b) Public open space will be required onsite **(Policy G2)**. The location of the public open space should take into account opportunities to provide connections and enhancements to the adjoining Cowley Marsh Recreation Ground including supporting the existing sports uses accommodated there.* **And an additional criterion under 'additional details' as follows**: *XX) The site is adjacent to a playing field used for sports including cricket and as such design proposals should give consideration to the need for appropriate ball stop fencing at the boundary of the site to mitigate risks of ball strikes so that those uses can continue to be supported there.*
SPS6	Planning permission for this site has been submitted (25/00813/OUT). This site could provide an extension to the	Pending the outcome of the Playing Pitch Strategy, it is recommended that the opportunity for this site to	This site is currently allocated in the OLP36. On submission of that plan, the policy required compensation for

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Former Iffley Mead Playing Field	adjacent community playing field to meet the increase in demand from that site.	provide community playing field is reconsidered. For example an area of the site could provide for an extension to the adjacent community playing fields.	loss of the pitch. At hearings, Oxfordshire County Council as landowner argued that this was not justified as the site had not been needed as a playing field for some time. The City Council and Sport England attempted to justify the requirement, but the Inspector agreed with the county that the site was surplus and that requirement had to be removed as a mod. There is no relevant change in circumstance. However, new public open space is required, and it is noted that this could be an extension of the adjacent playing field.
SPS7 Kassam Stadium	The Kassam stadium has an existing playing field and this will need to be addressed in the policy. The stadium cannot be redeveloped until a new stadium for Oxford United has been provided. Whilst the replacement Oxford United ground has been permitted in Cherwell, it will take time for a new ground to be constructed. It is therefore important that the Council retains its existing local plan requirement to protect the stadium (Policy SP14);	The following text could be added to the policy; 'Development of the Kassam Stadium football pitch, stands and access shall not be commenced until the replacement stadium (insert Cherwell planning application reference) has been implemented and made available foruse.' Otherwise the football team could have a period of years without a stadium, other examples where this has occurred include Truro City (returning to their ground this year after a period of 3-4 years) and Newport FC on the Isle of Wight	Policy SPS7 currently says: *The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected.* It is not considered justified to go as far as your suggested amendment, however, we would be happy to propose a mod that adds a requirement for the applicant to show consideration for how existing users of the stadium could be accommodated should there be a delay in a new venue coming forward if this would help to alleviate your concerns, for example:

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		(whose plans for a new ground have stalled).	*XX) Proposals should include details setting out how existing users of the stadium site could be accommodated elsewhere if alternative facilities are not yet available.*
SPE7 Lincoln College Sports Ground (And SPE4 Jesus College Sports Area)	This site is adjacent to Jesus College sports area (SPE4). Sport England also objects to the inclusion of these playing fields within the Local Plan, particularly as the Council has not completed its Playing Pitch Strategy (see also comments on evidence base under G1) and the PPS document currently does not cover tennis.	The policy is not consistent with national planning policy, positively prepared or justified (NPPF paragraph 103) and should be removed from the plan.	As we mentioned in our catch up, the Policy assumes replacement on site, and currently says: *c) There is potential to consolidate and share sports provision with the neighbouring Jesus College Sports Area (Policy SPE4). If sports provision can be shared and still provide the same capacity to meet playing pitch needs, then a larger area of the site(s) could be developed. Contributions could be made to improving a local facility such that its capacity increase replaces what is lost on the site(s).* We feel this appropriately responds to your concerns.
SPE16 Thornhill Park	This site is adjacent to Risinghurst Cricket Club and there is potential for ball strike from cricket balls used on the playing field. The proposals also appear to support the loss of the pavilion used by the sports clubs on adjacent playing field (d) https://risinghurstandsandhills-pc.gov.uk/wp-content/uploads/2025/09/RPFCIO-Annual-Report-and-Accounts-24-25.pdf	Criteria (d) should be amended to; 'Proposals for development must include a replacement pavilion for the adjacent playing fields' The policy should also include; 'Consideration be given to any issues resulting from ball strike from the adjacent cricket ground if ball stop fencing is required along the site boundary this should form part of the planning application'.	The site does contain a disused playing field although Sports England comments on the previous planning application for the site (21/01695/FUL) were that the site is not considered to form part of, or constitute a playing field as defined by the Town and County Planning Order and had not raised an objection.

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	It is not clear from aerial images but the proposal site may be existing playing field and its existing use should be reviewed through work on the Council's playing pitch strategy. Sport England objects to criteria (d) as this has not been evidenced by the Council and is not compliant with paragraphs 103 or 104 of the NPPF.	Currently Sport England considers the policy does not meet the soundness tests.	When the previous permission was granted for the site, a contribution towards a replacement pavilion for the pitch to the south of the site was agreed in order to satisfy requirements of LP2036 policy G5 on outdoor sports which protects the open space at present. Criteria d of the LP2045 policy carries forward this requirement and we are therefore unclear on the justification for the alternative wording you propose, but are happy to discuss further. In relation to your other points, we suggest an additional criterion could be added under the 'additional requirements' to respond to your point about ball strikes. **Additional criterion to be proposed through a mod as follows:** *n) The site is adjacent to a playing field used for cricket and as such design proposals should give consideration to the need for appropriate ball stop fencing at the boundary of the site to mitigate risks of ball strikes so that those uses can continue to be supported there.*
SPE18 Warneford Hospital	This site contains a former playing field that may be needed by the community. A planning application is in progress on the site. The national planning policy	As new housing is being proposed within this location, the Council should work with the applicant to retain the playing field within the	LP2036 established (and LP2045 carries forward) that: *loss of the former sports facility is considered justified only due to the need for and*

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	framework is clear that playing fields should be protected from loss.	wider site to provide a sports facility that will benefit the wider community.	*benefits of new hospital development.* Nevertheless, the open space is identified as supporting GI through Policy G1 and that policy sets out requirements for mitigating losses more generally which would come into effect.
SPCW10 Oxpens	Sport England objects to this policy as whilst it refers to granting permission for leisure development it does not reference retaining the ice rink and should be amended to make it clear in the text that the ice rink will be retained. Sport England is further concerned about the impact of this development on the ice rink. This is a regionally important facility and parking may therefore be required to support events. The viability of the ice rink as a venue may also be adversely impacted by development adjacent to it (for example, construction). The impact could potentially be so significant that these considerations should be explored and evidence presented before such a large allocation is made. As currently drafted, Sport England considers that the policy does not adequately protect the ice rink facility. The proposed wording as written also appears to suggest that development on the existing open space in this	The following text should be added with the following heading – 'Existing sports facilities': 'Development proposals for the site should ensure that the ice rink is retained within the site and information should be provided by the applicant to demonstrate that the operation of the ice rink will not be adversely affected by the proposals.' The existing open space that will be retained should be shown on the proposals map if it is affected by the development.	The ice rink is an in use facility and other policies protect this use (although there is no justification for protecting it as it is and on the site). The other policies could be cross-referenced if that would be helpful, although this is not considered necessary. **Proposed mod would be to add an additional criterion as follows:** *XX) The ice rink is a regionally important facility and proposals which could impact upon this venue will need to accord with the requirements of* ***Policy C3.***

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	location is acceptable. Policy is contrary to NPPF paragraphs 103 and 104 and therefore fails the relevant soundness test and the lack of evidence provided in relation to indoor sports facilities within the plan means that it has not been positively prepared or adequately justified.		
General planning for sports infrastructure	The Council has not undertaken any new work looking at existing (or the need for new) indoor sports facilities in Oxford. This work is needed to inform the Council's infrastructure delivery plan and decisions about the community infrastructure levy in Oxford. There will also be needs arising from city residents for indoor sports facilities and to support policies such as SPCW10: Oxpens. Iti is recommended that with the increase in residents expected in Oxford, this important work is started without delay.		As touched upon earlier, the Local Plan has limited control over many types of indoor sports facilities, however, where we can, the approach is to seek to protect what we have through policies such as Policy C3. Where a particular allocation could impact a use – the impact has been considered and wording incorporated into the allocation to deal with any reprovision requirements. Whilst there is not a specific new study focused solely on indoor sports, the evidence base includes the Oxford Retail, Leisure and Town Centre Needs Study and this did look at a high level at commercial leisure needs including indoor sport.
SPE2 East Oxford Bowls Club	It is proposed to develop this former bowls club site. The Council has not provided evidence within the local plan to demonstrate that the bowls site is no longer needed for bowls but also to investigate whether alternative sport	Evidence should be provided that considers whether the bowls provision is still needed in this area and if not then what alternative sports and recreation provision could be accommodated on this site.	This site is considered to meet the test of being surplus to requirements. The bowls club folded over 20 years ago due to lack of interest and there as been no use of the site since. The pavilion it once housed burnt down It

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	and recreation could be accommodated on the site.		has been entirely closed off and unused during this time.
SPS3 Bertie Place	This recreation ground has amenity and play value for the local community, it's place on the site allocations list should be reviewed. The planning application 23/00988/FUL remains undecided.	In light of the community representation on planning application 23/00988/FUL, the Council may wish to consider whether to deallocate this site.	Policy sets out that a public playground and MUGA should be re-provided on site at Bertie Place. The open space is also designated as supporting GI through policy G1 and as such any proposal that results in loss/harm will need to be mitigated in line with that policy's requirements.
SPS15 Sandy Lane Recreation Ground	Sport England objects to the allocation of these community playing fields which are actively used by local sports teams (principally football) and Sport England has had a number of residents contact us raising concerns about the allocation of this site who weren't aware of its allocation in the previous Local Plan. Sport England welcomes the inclusion of criteria (a) and (c) but these are insufficient to secure the protection of these playing fields from development which provide for community sport in the city in addition to recreation use. If the Council means that the playing field will be moved and replaced elsewhere then the policy should state this and an alternative site should be allocated within this Local Plan. Sport England does not support criteria (b). The current site functions as one whole with the ability to move pitch layouts within it and support multiple	Sport England recommends that the site is removed as an allocation in the Local Plan unless a new allocation can be introduced that shows where the community playing field can be replaced in Oxford.	The policy has been drafted on the assumption that pitches are to be relocated, however, the requirements are worded in a way that allows both situations to be addressed (pitches are relocated or retained) and sets out what is expected (specifically that reprovision of pitch capacity on or offsite will be needed where existing pitches are lost). An allocation for new pitches is not considered necessary to ensure that these requirements are carried out, the policy includes the requirements which will need to be demonstrated by the applicant through the application. On your point about retaining quantity and the concerns about the wording of criterion b, we have generally worked to date on the understanding that in our constrained context, the key requirement in looking for any

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	teams from the same club (different age groups) on site together. Whilst Sport England would support quality improvements to the existing playing field this would not be sufficient compensation for the loss to community football. Improving quality without retaining the same quantity means that there is less space for play to take place on. It is preferable to have a large site playing field rather than a single pitch site as these are expensive to maintain. Page 25+ of our Playing Fields Policy contains more information about what to consider when seeking to replace playing field.		reprovision is about ensuring existing capacity of a site's pitches is not lost, rather than a like for like replacement in terms of size/number of pitches. That is the rationale behind the criterion setting out that there could be opportunities to enhance quality to improve capacity where the overall quantity of pitches is consolidated (though it does not state this is the only way the pitches could be addressed). Of course, the applicant would need to explore this further through the planning application process and demonstrate that their approach to reprovision sufficiently mitigates any losses. We're happy to discuss this further however if Sports England disagree with this stance.

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Oxfordshire County Council

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
S1	General comment highlighting the County's expectation to agree developer contributions in respect of development proposed in the plan.	Policy S3 sets out more information about developer contributions.	No change proposed
S3	Policy should be strengthened to ensure proportionate contributions can be adequately secured for the delivery of the line, stations and placemaking elements that unlock new development.	Policy S3 already includes a bespoke reference to the Cowley Branch Line and how contributions are expected to be sought. The County's proposed amendment is in a different part of the policy, which relates to infrastructure contributions more widely. The County Council Representation does not accurately reflect the existing text in policy S3. The correct articulation of the County Council Reg. 19 representation is set out below (the underlined text below shows the full extent of the Couty's proposed amendment). *Planning permission will be granted subject to the provision of (or appropriate funding towards) the required level of infrastructure to support the development through an appropriate financial contribution prior to, or in conjunction with new development.* This additional text would appear to seek financial contributions only from new development. It is unnecessary and potentially confusing to include this additional text as the policy is already clear that the granting of planning permission is subject to the	Add the following additional text to the second sentence of the second bullet point of the supporting text of Policy S3 under the "Policy context" heading. *...Developer contributions and the delivery of infrastructure will be sought through the most appropriate mechanism available, ~~using the Community Infrastructure Levy (CIL) and planning obligations (e.g., Section 106 (S106) or S278 agreements).~~ including through the use of pooled contributions and/or forward-funding, where appropriate.* Then insert the following text and create a new (3rd) bullet point within the "Policy context" section. *Developer contributions are currently secured in Oxford using the Community Infrastructure Levy*

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		provision of the required infrastructure (or an appropriate financial contribution) to support the level of development proposed. However, the City Council acknowledges that S106 contributions can be secured through a variety of mechanisms and as such is proposing an amendment to the supporting text to clarify that position.	*(CIL) and planning obligations (e.g., Section 106 (S106) or S278 agreements).*
S4	The County Council does not support this policy as it is not in line with the County Council's policies on low carbon and the LTCP objectives in relation to reducing car trips. The County Council would like to see developers encouraged to make the best use of land, creating sustainable buildings at good densities and not using land wastefully on car parking. Although discussions with the City Council have taken place, it is the County Council's view that this policy undermines County policies and this matter should be left to specific negotiations between developers and Councils on a case-by-case basis.	Policy S4 introduces a cascade for housing sites and for employment generating uses. The County Council response is only concerned with the housing viability cascade. Policy S4 is included in the Plan to ensure that (in accordance with the NPPF, paragraph 35), the policies for contributions do not undermine the deliverability of the Plan. The supporting text for Policy S4 sets out that that it provides the basis for negotiations relating to viability, the City Council's priorities for contributions, and the evidential expectations required to demonstrate the viability of an individual scheme. The cascade approaches provide a standardised approach to ensuring development viability. The supporting text of the policy highlights that the viability assessment prepared for the Local Plan 2045 identifies a suite of policies likely to have the greatest potential impacts on site viability.	No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		As such, the cascade approaches would seek to reduce a scheme's offsetting payments in the first instance, followed by, in the case of residential schemes, the low car element of the policy (low car development is defined in Appendix 7.6 as follows: *0.2 car parking spaces per 20 units should be provided on site for working drivers, service and delivery vehicles, pooled cars/car clubs and visitor spaces.* As such, where viability issues exist for residential schemes, Policy S4 provides an approach to firstly increase allocated spaces, and then increasing the number of spaces incrementally up to the maximum parking standards (as set out in Appendix 7.6). The Local Plan Viability Assessment Update (BNP Paribas, December 2025) provides evidence to support the viability cascade involving car parking as set out in this Policy.	
H1	<u>General comment</u> The County Council has an interest in understanding how the city is meeting its housing need (and any unmet housing need arising) as any new strategic housing allocations are likely to have transport, education and other implications for the County's statutory functions.	<u>General comment</u> General comment noted.	<u>General comment</u> No action required

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	General comment: Infrastructure costs The County Council is particularly concerned about growth leading to increased vehicle trips (counter to LTCP targets) and whether the cost of necessary infrastructure to serve housing growth can be met as it may be unaffordable to developers and government and therefore lead to a reduction in quality of life or services. General comment; location of sites for Oxford's unmet housing need The County Council's position is that any site allocations should be well-located in relation to the people they are intended to accommodate. Oxford's unmet housing need should be met on sites close to Oxford, either with good existing walking cycling and public transport links or the ability to provide such links funded from development. Density/ site capacities The County Council is also of the view that the housing capacity of the city needs to be carefully reviewed. This is to ensure the maximum level of housing provision within the city boundary. In particular, areas such as Cowley	General comment: Infrastructure costs General comment re: infrastructure costs noted. General comment; location of sites for Oxford's unmet housing need General comment re: location of sites to meet Oxford's unmet housing need noted. Density/ site capacities The City Council has done extensive work looking to maximise densities of residential developments and the residential component of mixed-use developments within the city. Site allocation policies contain minimum numbers of dwellings, all of which have been confirmed with landowners that they are deliverable. We are confident that our density assumptions are realistic and deliverable. The Background Papers BGP 015 Developing Site Allocations and BGP 016 Efficient Use of Land set out the approach to identifying sites	General comment: Infrastructure costs No action required General comment; location of sites for Oxford's unmet housing need No action required Densities/ site capacities No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Templars Square (Cowley Centre) and Headington where environmental and heritage constraints are less than in other areas. Policies HD1 and HD2 and relevant Areas of Focus must be reviewed to ensure maximum densities can be achieved. <u>Housing at employment sites</u> A number of proposed site allocations (e.g., SPS12 Oxford Science Park) recognise a level of housing could be acceptable however no capacity study or indicative minimum has been undertaken. This comment is repeated later in the representation. <u>Kassam Stadium assumed density</u> Another site allocation, where the minimum density is questioned is the Policy SPS11 Overflow Car Park at Kassam Stadium (allocated for a minimum of 100 homes). The County questions the assumed density of 80dph and suggests that, given the urban nature of the site's location should be applied, in order to maximise the use of the site under Policy HD2,	involving residential development and provide the methodology for identifying appropriate density typologies and for identifying site capacities. <u>Housing on Employment sites</u> See response below for Policy SPS12/E1 <u>Kassam Stadium assumed density</u> Background Paper 016 Efficient Use of Land sets out the methodology for identifying appropriate density typologies and for identifying site capacities. We are confident in our density typologies and the evidence that has underpinned them. It would not be appropriate to simply apply an alternative density assumption to this site.	<u>Housing on employment sites</u> See response below for SPS12/E1 <u>Kassam Stadium assumed density</u> No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	thereby reducing the amount of housing need in Oxford.		
H2	Oxford's need for affordable housing is well-known and it is disappointing that the requirement is proposed to be reduced to 40%. Various sites adjoining the city (in neighbouring district council areas) have a requirement for 50% affordable housing, which aligned with the plan requirement at the time they were allocated (i.e., extant Local Plan 2036). Would the current requirement for 50% affordable housing on sites in neighbouring districts be undermined by having a lower (i.e., 40%) affordable housing requirement in Oxford?	The Local Plan viability study provides evidence for affordable housing and other proposed policy requirements.	No changes proposed
H4	The County Council welcomes the recognition of the need for employer-linked affordable housing for key workers.	General comment noted.	No change proposed
E1	(Strategic Planning) Policy E1 indicates the circumstances in which new employment uses will be favourably considered. It also includes a part which provides for residential development on employment sites subject to criteria. The criteria include matters of particular interest to the	General comment noted	No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	County Council such as being well connected to public transport and active travel opportunities.		
E1	(OCC Estates and Property) Policy objective (para.1) Paragraph 1 and definitions The County Council supports the objective of the first paragraph of the policy. Employment site categories (paragraph 3/ supporting text) The County Council considers the phrase *Existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class)* to be lengthy and consequently, impractical and confusing. The County Council suggest re-wording this phrase both within the policy and supporting text as follows: *Existing Non-Key employment sites* Paragraph 3 The County Council supports the aims of paragraph 3, however has proposed some minor modifications to improve clarity and overall application of this paragraph in line with the above suggested changes.	Policy objective (para.1) Support noted. Employment site categories (paragraph 3/ supporting text) The City Council does not support this proposed modification. The suggested phrase 'Non-Key employment sites" could be open to a very wide interpretation. For instance, it could be interpreted that the phrase 'non-key employment site included any other site in the city that was not a Key Employment site. This would mean that any site in the city could be a potentially suitable location for new employment generating uses. While the phrase is lengthy, the City Council considers that it is one which benefits from being precisely worded so as not to create unnecessary loopholes which could be used to deliver increased floorspace for employment-generating uses, when the identified needs for these uses can be met through the current policy approach.	Policy objective (para.1) No change proposed Employment site categories (paragraph 3/ supporting text) Suggest the following modification to Policy E1 (paragraph 3 Amend 3rd paragraph of the policy as follows: ~~Outside these locations:~~ On existing employment sites or those in lawful uses for the proposed employment use class, which are outside the city or district centres, and which are not designated as Key Employment sites, proposals for regeneration and/or additional floorspace with employment-generating uses will only be supported if: a) ~~Existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class),~~

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		The City Council has put forward a modification, to highlight that the phrase should be read as a singularity, and to make it less confusing for the County Council.	~~can only be regenerated with employment generating uses if~~ better and more intensive use is made of the site through the redevelopment, up-grading or re-use of existing under-used buildings; and b) ~~Proposals for additional floorspace for employment generating uses on existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), outside the city and district centres must follow~~ the sequential approach is followed for new town centre uses as set out in Policy C1. No change proposed for supporting text
E1	(OCC Property) Paragraph 2: *Planning permission will be granted...* The County Council has previously expressed their concerns about the use of the phrase "*planning permission will be granted*", as it could confuse the decision-maker by giving them the impression that proposals should be permitted without taking into account	Paragraph 2: *Planning permission will be granted...* The City Council notes that it is only within Policy E1 where the County Council has expressed concern about the use of the phrase "*planning permission will be granted*", causing potential confusion to decision-makers. The City Council does not accept any of the proposed changes from the County Council, which we believe	Paragraph 2 No change proposed

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	instances where material considerations could exist that substantially outweigh the benefits of permitting such a use. The word 'support' is considered more appropriate as it would provide a greater level of flexibility. The County Council proposes that all references to "Planning permission will be granted" within Policy E1 (only) be replaced with general supportive/non-supportive statements to be applied to development proposals.	would serve to undermine the plan's focus to support housing delivery. The suite of proposed changes by the County Council to Policy E1 serve collectively to weaken the plan's Employment Strategy by enabling employment-generating uses to come forward across a wider range of sites than the Reg. 19 version of the policy allows for. Whether or not the plan supports or does not support a planning application does not give a clear steer to planning officers in making their report recommendations or elected members when determining planning applications. The County Council's proposed changes could enable employment-generating uses to proliferate across the city.	
E1c	Paragraph 4 The County Council considers the fourth paragraph to be confusing due to repeating matters addressed in earlier paragraphs and therefore does not add value to this policy. Accordingly, it is recommended to be deleted. Proposed amendment to paragraph 4 is as follows: ~~Planning permission will not be granted for~~ **Development** proposals for employment generating uses outside	Paragraph 4 ***Original Reg. 19 Plan policy text*** *Planning permission will not be granted for proposals for employment generating uses outside the following locations:* *c) Key Employment Sites;* *d) the city and district centres;* *e) existing employment sites not designated as Key Employment sites (or those in lawful use for the proposed employment use class).*	Paragraph 4 No change proposed

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	the following locations **will not be supported**: c) Key Employment Sites; d) the city and district centres; e) existing **non-Key** employment sites ~~not designated as Key Employment sites (or those in lawful use for the proposed employment use class)~~.		
E1d	Paragraph 5 The clarification given in the fifth paragraph is also not considered appropriate for inclusion in the policy text, as the classification of employment sites is provided in the supporting text. The County Council suggests retaining the first sentence and deleting the rest of the text. *Proposed modification* *Key Employment Sites are listed in Appendix 3.1 and are shown on the Policies Map.* ~~*All other employment sites are existing employment sites not designated as Key Employment Sites.*~~	Paragraph 5 ***Original text as follows:*** *Key Employment Sites are listed in Appendix 3.1 and are shown on the Policies Map. All other employment sites are existing employment sites not designated as Key Employment Sites.* It is unclear which test of soundness this proposed modification is based on as the representation in relation to this paragraph suggests that this distinction is covered in the supporting text. While the supporting text frames the categorisation of the two types of employment sites, it does not provide the level of detailed differentiation provided within the policy itself. The City Council does not accept the proposed modification as the policy text provides clear articulation about the specific types of employment sites.	Paragraph 5 No change proposed
	Paragraph 6 The sixth paragraph highlights that development proposals for the	Paragraph 6 *Original policy text*	Paragraph 6 No change proposed

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	conversion of Key Employment sites to residential will only be permitted when the employment use can be maintained and the number of jobs be retained. The County Council raised significant concerns about this part of the draft policy in the Regulation 18 stage, as it was considered too restrictive and lacking the necessary proportionality to ensure there is consistency in decision-making. The Council's position to not permit any loss of jobs is acknowledged and respected. Nonetheless, it is essential to consider adding a degree of proportionality to ensure that this draft policy is effective, and decision-makers make consistent decisions. As previously suggested, a "percentage" instead of number of jobs is considered a more appropriate metric as different economic circumstances and needs apply to small, medium and large businesses. Given the aspiration of the Council to retain most, if not all of the jobs, a high percentage could be justifiable and help with unlocking Key Employment Sites for development	***Loss of employment floorspace and the use of employment sites to support housing delivery*** *Planning permission will not be granted for development that results in a net loss of employment floorspace on Key Employment Sites unless it can be fully justified where:* *f) The employment use can be maintained; and* *g) The number of jobs in employment generating uses is retained.* The County Council has not suggested a precise percentage of jobs that should be retained or lost should there be a corresponding loss of employment floorspace at Key Employment Sites. Neither was a precise percentage expressed previously. The City Council's position is that the number of jobs in employment generating uses should be retained.	

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	proposals that deliver similar levels of employment. Proposed modifications: ***Loss of employment floorspace and the use of employment sites to support housing delivery*** *Planning permission will not be granted for d**D**evelopment **proposals** that results in a net loss of employment floorspace on Key Employment Sites **will not be permitted/supported** unless it can be fully justified where:* *f) The employment use can be maintained; and* *g) ~~The number~~ **At least x%** of jobs in employment generating uses is retained.*		
	Paragraph 7 The seventh paragraph refers to objectives c) and f) which are currently absent from the draft policy. Accordingly, this will need to be corrected. This paragraph echoes the requirements set out in paragraph eight. It is therefore considered to result in unnecessary duplication. Therefore, it is	Paragraph 7 Original text of paragraph 7 is as follows: *Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory assessment of objectives c) to f)).* The City Council agrees that there was a drafting error in this paragraph and proposes a minor modification to overcome it.	Paragraph 7 Update Paragraph 7 to reflect the correct objectives (i.e., objectives h) to m)) Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory

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	recommended that it is merged with paragraph eight. County Council suggest deleting paragraph 7 in its entirety. ~~Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory assessment of objectives c) to f)).~~	This paragraph does not unnecessarily duplicate paragraph eight of the policy. Instead, it sets out that planning permission will be granted for the loss of any existing *employment sites not designated as Key Employment Sites* to other uses, while proposals for housing will be supported subject to a satisfactory assessment of specified objectives (see proposed minor modification to correctly reference these objectives).	assessment of objectives h) to m)~~c) to f)~~).
	Paragraph 8 Paragraph eight sets out the material planning considerations that will be taken into account when considering development proposals for the redevelopment of Key and non-Key employment sites. OCC recommends a number of modifications to improve clarity, usability of each objective, and make the decision-making test more transparent. **Development P**~~p~~roposals involving housing **and other uses** at Key Employment Sites and on existing **non-Key** ~~employment sites not designated as Key Employment Sites~~ **will only be permitted where they can**	Paragraph 8 Original text of Paragraph 8 sets out that: *Proposals involving housing at Key Employment Sites and on existing employment sites not designated as Key Employment Sites will be assessed by a balanced judgement which will take into account the following objectives:* *h) Meet as much housing need as possible in sustainable locations....* Objectives h) to m) of the policy are specifically tailored towards supporting housing delivery and ensuring the continued operation of existing businesses and employment sites. The objectives have been specifically drafted to ensure that, where housing is proposed across the city's employment site network,	Paragraph 8 No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	demonstrate that they have regard to ~~will be assessed by a balanced judgement which will take into account~~ the following objectives: h) Meet as much housing need as possible in sustainable locations...	this results in an appropriate living environment for future residents. The phrase "will be assessed by a balanced judgement..." was introduced by the Local Plan 2036, Planning Inspector to ensure that consideration was given to a suite of objectives which would deliver a suitable environment for any future residents. The LP2045 has retained this extant phrasing to ensure that proposals involving housing across the city's existing employment site network are considered consistently. Paragraphs 6-8 of Policy E1 work together to establish the conditions where employment floorspace can be lost on Key Employment Sites (para.6), and on existing *employment sites not designated as Key Employment Sites* (para.7). The policy finally sets out a suite of objectives specifically drafted for proposals involving housing that come forward on sites within the city's exiting employment site network. The policy, as originally drafted, establishes the principle that the complete loss of existing *employment sites not designated as Key Employment Sites* is allowed, while proposals for housing are supported (subject to a satisfactory assessment of specified objectives). The County Council's proposed changes would effectively make it harder to redevelop existing	

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		employment sites not designated as Key Employment Sites for housing (and also introduce unnecessary requirements for other uses proposed on these sites). For Key Employment sites, the County Council's proposals would serve to support "other uses" on Key Employment Sites while making it harder to bring forward "proposals involving housing" at Key Employment Sites. The County Council's proposal to delete paragraph seven and merge its contents with paragraph eight would result in 'in principle' support for "other uses" on Key Employment Sites.	
G1	(Landscape and Nature Recovery – Biodiversity / Landscape) <u>G1 layer extends beyond city boundary</u> The G1 layer appears to cover some designated wildlife sites both inside and outside the city boundary but not all, for example Littlemore Brook Oxford City Wildlife Site which connects multiple areas currently designated within the green infrastructure network.	<u>G1 layer extends beyond city boundary</u> The example given is of an "Oxford City Wildlife Site" - Littlemore Brook. This is an Oxford City Council local ecological designation. As such, its extent does not extend beyond the City Council administrative boundary – in fact no G6 Oxford City Wildlife Site extends beyond the city's administrative boundary. There are two instances where the G1 layer extends beyond the City Council's administrative boundary. In both instances, part of the site is located within the city council boundary, and part of the site is located within a neighbouring district council's administrative boundary. This is a mapping error. The Core GI network	<u>G1 layer extends beyond city boundary</u> Amend policies map to accurately reflect the extent of coverage of sites in the city.

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		policies only apply in Oxford city and not outside our administrative boundary.	
	Inclusion of all designated wildlife sites in Core GI network The inclusion of all designated wildlife sites in the core area of the green infrastructure network is encouraged to help ensure the aims of this policy are realised.	Inclusion of all designated wildlife sites in Core GI network The Core GI network includes sites which meet specific GI criteria (as set out in the GI Study). All sites in the city were assessed and included within the Core GI network when sites met specific criteria. Designated sites (i.e., the SAC, SSSIs, LWSs, OCWSs, LNRs) are included within the core GI network.	Inclusion of all designated wildlife sites in Core GI network No change proposed
	Connecting GI features A focus on connecting green infrastructure features not currently mapped would be welcomed.	Connecting GI features Supporting text to Policy G2 makes reference to strengthening linkages between areas to enhance network connectivity.	Connecting GI features No change proposed
	Mitigation hierarchy Reference to the mitigation hierarchy within this policy regarding G1B and G1C areas would be welcomed where avoidance and mitigation are currently mentioned.	Mitigation hierarchy Policy G6 (supporting text) sets out that the mitigation hierarchy needs to be followed when considering Policy G6 ecological designations.	Mitigation hierarchy No change proposed
	Trees and woodland With regards to impacts on trees and woodland, ecological enhancement of existing trees and woodland should also be considered for inclusion. It may also be important to refer to onsite	Trees and woodland Ecological enhancements are covered in Policy G2.	Trees and woodland No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	compensation in advance or as soon as possible after the impact being preferable in this section through following the mitigation hierarchy including temporal and spatial considerations. Canopy cover (net gain) Inclusion of the requirement for a net gain in canopy cover, over a no net loss, is encouraged where it can be demonstrated that this is ecologically appropriate. Right tree in the right place Urban settings can present challenges for new planting with the right species and habitat choice and ongoing management are crucial. The principle of the right habitat in the right place should be applied and reflected in this policy.	Canopy cover (net gain) The policy approach broadly aligns with national policy. We have sought a broader green surface cover target through the UGF policy (G3) which could include new trees but also other types of greening depending on what is best for the site. Right tree in the right place The principle of the right tree in the right place is already included with the Council's Urban Forest Strategy. Policy G2 sets out maintenance and management requirements.	Canopy cover (net gain) No change proposed Right tree in the right place No change proposed
G1	(OCC Property) General comment The County Council manages a large number of school playing fields and other sites used for recreational purposes, which are currently designated as "Supporting Green and Blue spaces" under this draft policy.	General comment General comment noted.	General comment No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	G1b requirements The County Council is concerned that the requirement for the reprovision of similar or higher quality green infrastructure on site can restrict the County Council from discharging its public protection and education duty by improving and expanding recreational spaces and school fields. Paragraph 104 of the NPPF already sets out the circumstances when development proposals for the loss of existing open space, sports and recreational buildings and land will be considered acceptable. These criteria are also currently being proposed to be retained in the draft version of the NPPF, which is currently in consultation. Therefore, and for the sake of enabling sustainable development and adopting a Local Plan that is in general compliance with national policy, the following minor modification is recommended to ensure the tests of soundness are met. Proposed modification:	G1b requirements Original text of Policy G1 – G1B: Supporting spaces, states: *Planning permission will only be granted for proposals which affect spaces identified a part of the Supporting GI Network where any harm/loss is mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher. These spaces are designated G1B on the policies map.* It is important to replace GI/ BI that needs to be re-provided close to where it was lost – the wording guides applicants towards this in the first instance but does not force them to do this. We are not proposing to change this part of the policy.	G1b requirements No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	"G1B: Supporting spaces Planning permission will only be granted for proposals which affect spaces identified a part of the Supporting GI Network where any harm/loss is mitigated by ensuring sufficient reprovision, ~~ideally onsite,~~ and to the same standard or higher. These spaces are designated G1B on the policies map."		
G2	LNRS Reference Reference to the use of Oxfordshire's Local Nature Recovery Strategy (LNRS) to inform design and decisions is considered key for this policy. Maintenance and management The maintenance and management arrangements of this policy also link to biodiversity net gain. It may be useful to clarify that the management period of 5 years would be a minimum with longer encouraged and if BNG is being delivered a minimum of 30 years would be required. Right tree in the right place Urban settings can present challenges for new planting with the right species and habitat choice and ongoing	LNRS Reference Policy G4 Delivering Mandatory Net Gains in Biodiversity and its supporting text refer to the LNRS. Maintenance and management BNG is discussed in detail in Policy G4. Right tree in the right place The principle of the right tree in the right place is already included with the Council's Urban Forest Strategy.	LNRS reference No change proposed Maintenance and management No change proposed Right tree in right place No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	management are crucial. The principle of the right habitat / tree in the right place should be applied and reflected in this policy. <u>General comment</u> Larger growing trees that are suitable for the local conditions should be chosen where space permits as these have the potential to offer greater environmental and visual benefits than small trees in the long-term. <u>Additional percentage targets</u> Targets such as percentage canopy cover and a net increase in green infrastructure should be considered for inclusion and would be welcomed.	<u>General comment</u> General comment noted <u>Additional percentage targets</u> Consideration was given to the inclusion of a canopy cover target within the plan. The difficulty for Oxford is that tree canopy cover is not evenly spread across the city, with some areas benefitting from more cover than others. Setting a percentage canopy cover target for a city with such diverse tree canopy cover would mean that some areas exceeded the target and others fell below it. Given the diverse range of existing tree canopy cover it was considered more appropriate to ensure no net loss of trees. A policy target for a net increase in GI (in addition to the mandatory 10% net gain in biodiversity and the 10% public open space requirements for qualifying residential developments), was not considered	<u>General comment</u> No change proposed <u>Additional percentage targets</u> No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		appropriate for Oxford given its constrained nature and the inherent difficulties	
G3	General comment The County Council believes that the Urban Greening Factor (UGF) has potential to deliver benefits in delivering green infrastructure across the city, and we welcome its inclusion in the policy framework. UGF mandatory for all developments We note however that the policy is that the UGF is not mandatory for all developments. However, we wonder whether greatest green infrastructure benefits could be achieved if it was mandatory for all developments, especially if located in areas of existing GI deficiency unless particular circumstances and reasoning are demonstrated. Definition of major development Major development should be defined.	General comment General comment noted UGF mandatory for all developments It is a requirement for larger developments and encouraged on smaller ones. Larger (major) developments can offer the most scope for a wide variety of improvements. Definition of major development Major development is defined in the NPPF (10 or more homes or 1,000 sqm non-residential floorspace). It was also included in the Glossary of the Reg. 19 version of the Oxford Local Plan 2045 following comments from Oxfordshire County Council made at the Reg. 18 consultation stage.	General comment No change proposed UGF mandatory for all developments No change proposed Definition of major development No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	UGF for non-major developments The application of UGF for non-major developments should be considered here as a way for smaller developments to demonstrate a measurable net gain in biodiversity to satisfy NPPF and local planning policy when they are exempt from the mandatory BNG requirement.	UGF for non-major developments Policy G3 already encourages smaller (minors/ householders) to apply the UGF.	UGF for non-major developments No change proposed
G4	20% BNG A minimum BNG requirement of 20% is encouraged in line with other emerging local plans in Oxfordshire. Alternative prioritisation It is recommended that prioritisation should be given to delivering ecological habitat enhancement and creation within the LNRS before delivering habitat enhancement and creation outside of the LNRS within Oxford. Encouragement should also be given to using offsite offset areas outside of the LNRS mapped areas within Oxfordshire as a step before considering sites further afield. It should be clarified that	20% BNG Oxford is a small, constrained city with limited opportunities to deliver the mandatory 10% net gains. Increasing the requirement to 20% would not result in more biodiversity net gain in the city but rather an increase in delivery outside of Oxford. District Plans already propose 20% BNG across Oxfordshire. It is important that BNG impacts are received locally. Alternative prioritisation See response above.	20% BNG No change proposed Alternative prioritisation No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	purchase of BNG units from a habitat bank is preferred to the purchase of statutory credits. It is considered that this approach would be more aligned to the LNRS. The encouragement of delivering more technically offsite difficult habitats that may deliver lower BNG units (due to the application of the difficulty multiplier within the metric) where feasible is welcomed and this approach should also be considered for onsite habitats where feasible.		
G5	Reference to LNRS Reference to the use of Oxfordshire's Local Nature Recovery Strategy (LNRS) to inform appropriate ecological enhancements is considered key for this policy. Encourage native tree planting The requirement to include an element of native planting is encouraged.	Reference to LNRS Reference to the LNRS is made in individual site allocations and within Policy G4 and supporting text. Encourage native tree planting Fourth paragraph of Reg. 19 policy includes a reference to "native planting".	Reference to LNRS No change proposed Encourage native tree planting No change proposed
G6	Application of LNRS Consideration should be given to how regard will be given to Oxfordshire's LNRS and in particular safeguarding of the priorities of the LNRS within this policy including how the LNRS interacts	Application of LNRS Reference to the LNRS is made in individual site allocations and within Policy G4 and supporting text. The background paper (005b Biodiversity) that was published for Reg 19 includes a full section on how we have had regard for the LNRS.	Application of LNRS No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	with the ecological network currently referred to. SSSI buffer zone 'Development proposed on land immediately adjacent to any SSSI **designated wildlife site or priority habitat** must be designed with a buffer to that site **or habitat'** Local sites Similarly, the text 'Where proposals result in habitat loss within a LNR or LWS, they must retain and enhance the interest features for which the site was selected' could be expanded to ensure other types of designated site are included. Road Verge Nature Reserves Reference to Road Verge Nature Reserves (RVNRs) as a type of designated wildlife site would be welcomed within this policy, particularly as RVNRs are present within Oxford. Further information regarding RVNRs and RVNRs within Oxford city can be found at	SSSI buffer zone The SSSI buffer zone was developed and evidenced through the Source Pathway Receptor Analysis (SPRA). The City Council does not consider that it is appropriate to arbitrarily widen its application to all designated sites/ priority habitats. The considerations for mitigating impacts from development will vary with every site (based on species and habitats present). Local sites No alternative text provided for consideration. City Council considers that the policy is sound as drafted. Road Verge Nature Reserves Supporting text already includes a link to Oxfordshire County Council biodiversity guidance.	SSSI buffer zone No change proposed Local sites No change proposed Road Verge Nature Reserves No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	https://www.oxfordshire.gov.uk/sites/default/files/file/countryside/RVNRSurveyReport.pdf.		
G8	**Urban design** Design guide The policy refers to the City's Design guide and other standards, it is not clear if these are already in place or are part of this Local plan and will subsequently be adopted. **Landscape and Nature Recovery – Biodiversity** Biodiversity and SuDS It should be clearly stated that SUDS design should aim to maximise biodiversity value as far as feasible.	Design guide The policy wording simply relates to the most recently published standards (and future proofs them for when new standards are published). Biodiversity and SuDS Policy already references green infrastructure and the supporting text highlights additional benefits including... "providing habitats to support wildlife".	Design guide No change proposed. Biodiversity and SuDS No change proposed
R6	Highest quality soils It would be useful to define what is considered 'highest quality soils' in the context of this policy. For example, nutrient poor soils would have a high value for biodiversity and creating species rich grassland habitats but a lower value for activities such as agriculture that would value a high nutrient soil content.	Highest quality soils This policy seeks to protect soils. The highest quality soils are often considered to be those in the higher categories of the Agricultural Land Classification system (i.e., grades 1-3a) - but it could vary depending on the specific context of the site (e.g. the profile of soils will look quite different in more rural parts of the city compared to more urban areas). Consideration was given to including a definition however it was considered that using a narrow definition (such as the above), may not provide contextually specific support for a range of soil types.	Highest quality soils No change proposed.

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
HD7	Definition of major development should be included in policy It is supported that Policy HD7: Health Impact Assessment contains the wording that HIA is 'required' for major planning applications, although it would be strengthened by making it clear in the policy wording exactly how Oxford City Council defines 'major'. Other local authorities are increasingly using quantifiable thresholds in their HIA policies. Appendix 6.2 contains further information on how to complete an HIA, directing the user to OCC's HIA Toolkit as well as specifying the thresholds for an HIA to be undertaken (10 or more dwellings or 1000m2 or more of non-residential development. This is strongly supported in principle, but would be more enforceable if this advice were included within the wording of Policy HD7 in the main body of the Local Plan. The County Council requests that the term 'major development' is defined	Definition of major development should be included in policy Major development is defined in the Glossary of the Reg. 19 version of the Oxford Local Plan 2045 and in National Policy (NPPF, December 2024). There is no need to re-define the term major development in this policy.	Definition of major development should be included in policy No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	within Policy HD7 itself (rather than just in Appendix 6.2)		
C1	Mobility hubs The first bullet point under the 'Policy context' section states: "The city and district centres are highly accessible mobility hubs that include a broad range of facilities including shops, hospitality, community and leisure facilities." The opening sentence is not clear on the definition of mobility hub. It reads that the city and district centres as a whole are mobility hubs. This sentence should be reworded and provide clearer language. One example could be: The city and district centres include a range of mobility hubs (refer to Mobility Hub Strategy) helping to create places which are highly accessible. Modification: clarify definition of mobility hub. For example: "The city and district centres include a range of mobility hubs (refer to Mobility Hub Strategy) helping to create places which are highly accessible."	Mobility hubs The intention is to set the context that district centres and the city centre are all highly accessible locations. Without adding a long (and potentially convoluted) explanation in the plan setting out the different types of hubs (major interchange hubs, linking hubs, suburban hubs), we consider that it might actually be more confusing to amend the supporting text in the manner that has been suggested. This is because it would not necessarily be obvious that there are different types of hubs, and it is not necessary for understanding that the city and district centres are highly accessible locations. However, a modification is proposed to add additional explanation to the Glossary.	Mobility hubs Amend the definition of Mobility hub in the glossary as follows: *Mobility Hub: An area in which a variety of transport modes and community assets are co-located for seamless interchange. In Oxford these vary from major interchange hubs, to linking hubs to suburban hubs. These facilities provide added benefit to communities and combined they make up an easy-to-use transport network*
C2	The County Council requests the following modifications to Policy C2: Modifications:		

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	OCC's Street Design Code • At the end of the first paragraph of Policy C2, after the phrase "[...] and this should be low car" please add "and have incorporated OCC's Street Design Code." Delete "well-located from bullet point e) • In sub-paragraph 'e)', please remove the word "well-located". It could be interpreted in a variety of ways. Include references to cycle parking in bullet point f) •In sub-paragraph 'f)' please add the following after "Public realm improvements for cyclists: "-by providing cycle parking in convenient locations which benefit the public realm using thoughtful inclusive design and materials, catering for standard and non-standard bikes, including children's bikes." Public space • While the text mentions tree planting, including incorporation of small greenspaces, it is important to still ensure there is some big open/public	OCC's Street Design Code As the County's most recent Street Design standards is not yet published, we have not referenced it in the plan. However, Policy C6 includes a reference to the published Street Design standards. Delete "well-located from bullet point e) This change weakens the policy as it does not support "well-located" public car parking. Include references to cycle parking in bullet point f) The amendments proposed seem to prioritise public realm improvements for cycling only focusing solely on cycle parking and neglecting other users, i.e., pedestrians and public transport users. Policy C7 already covers cycle parking requirements. Public space Bullet point h) states: *h) Enhancement and new opportunities for public realm and landscaping such as tree planting, including incorporation of small green spaces where people can stop, dwell, socialise and play;*	OCC's Street Design Code No change proposed (as agreed at Reg. 18) Delete "well-located" from bullet point e) No change proposed (as agreed at Reg. 18) Include references to cycle parking in bullet point f) No change proposed (as agreed at Reg. 18) Public space No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	space for people to dwell, rather than expect everyone to pass through.	Bullet point h) already provides advice about the enhancement of existing and the creation of new public realm and landscaping in the city and district centres.	
C4	Local Education Authority reference In the first bullet point under 'Policy context' in Policy C4, the text makes reference to the 'Local Education Authority' which is no longer in use. Please update the term to 'Local Authority with responsibility for Education'.	Local Education Authority reference We have proposed the following changes to the supporting text of Policy C4 and the Glossary to accommodate this terminological clarification.	Local Education Authority reference Amend second sentence of first bullet point as follows: *The City Council has worked closely with partners including the County Council as the Local Authority with responsibility for Education Local Education Authority to plan the educational needs of the city...* The phrase "Local Education Authority" also appears in the Glossary within the definition of "Keyworker". Bullet point ii) of the Key worker definition to be amended as follows: *ii) Schools: qualified teachers in any Local Authority with responsibility for Education Local Education Authority school....*

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	General comment re: joint user agreements Policy C4 states that planning permission will be granted for new / redeveloped learning institutions if (inter alia) where possible, joint user and shared use agreements are made. This is an appropriate phrasing: as set out previously, in the case of new schools it will not be possible at the point of granting planning permission to make joint use agreements, as there is not at that time a responsible body in place. Redevelopment projects at existing schools vary greatly, and will not necessarily result in any change in facilities which could be made available to the community. Accessibility requirements for new learning and non-residential institutions The requirement that school developments will be accessible to those who will use it by walking, cycling and public transport should allow for some flexibility as a matter of equality of access, as, for example, if the project is an expansion of a special school, depending on the needs of the pupils it	General comment re: joint user agreements General comment re: joint user agreements noted. Accessibility requirements for new learning and non-residential institutions The policy itself applies to all schools and not just SEND schools. Both new SEND schools, and the expansion of existing SEND schools should be accessible by a range of different modes of transport including public transport (which includes taxis). Given the accessible nature of Oxford, most schools in the city are accessible by a range of different modes.	General comment re: joint user agreements No change proposed Accessibility requirements for new learning and non-residential institutions No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	may not be possible for them to travel by walking, cycling and public transport. Loss of learning institutions The restriction that the loss of learning institutions will only be permitted where (inter alia) it can be demonstrated that the use can no longer feasibly be provided in its location could be changed to "feasibly and viably", to the financial viability of provision is one element of feasibility.	Loss of learning institutions We don't see that there is a need to explicitly reference viability as stated in the representations, it is already one element of feasibility.	Loss of learning institutions No change proposed
C6	(Transport Policy) Reference to improving health outcomes In the first bullet point under 'Policy context' it would be positive to add a reference to improving health outcomes along with the other outcomes mentioned here. Reference to County policies/strategies The County Council suggests Policy C6 references the following County policies: the County's Freight Strategy and the OxRail 2040: Plan for Rail. It is also worth recognising the County are working on delivering an integrated transport policy which will be	Reference to improving health outcomes Policy HD7: HIA already focuses on Health outcomes and requires a Health Impact Assessment. Reference to County policies/strategies The IDP and other policies in the Plan (e.g., West End and Botley Road Area of Focus - WEBRAOF) already include references to OxRail 2040: Plan for Rail. Having reviewed the County's Freight Strategy in relation to the sphere of influence for the Local Plan 2045, the Freight Strategy appears to be concerned more with freight movements and routing rather than with specific land use planning issues. Given the city's location in	Reference to improving health outcomes No change proposed (as agreed at Reg. 18) Reference to County policies/strategies No change proposed

3352

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	incorporated into LTCP, this will build upon the Oxfordshire Metro Concept. Vision Led Transport Planning The County Council recommends that C6 incorporates Vision Led Transport Planning as a requirement to ensure Oxford City has the highest quality developments, showing how developers have used Vision Led Transport Planning to achieve sustainable transport infrastructure. Paragraph f) In paragraph 'f)' please replace "Street Design Guide" with "Street Design Code".	relation to the SRN, it is unlikely that sites exist within the city boundary that are likely to meet road/rail freight distribution centre requirements. As such, we do not consider that a reference to it within Policy C6 is required. Vision Led Transport Planning The NPPF (December 2024) already sets out that a vision-led approach to transport planning should be considered. Having considered whether to make a reference to this in the plan, the City Council considers that National Policy and existing Policy contained within the LTCP is sufficient and does not need to be repeated in the city's Local Plan. Paragraph f) It is our understanding that the Street Design Code has not yet been published. However, when it is it will replace the adopted Street Design Guide. Suggest a minor modification to clarify that any equivalent future standards" should be followed.	Vision Led Transport Planning No change proposed Paragraph f) Update references to Oxfordshire County Council Street Design Guide to future-proof to ensure the most up-to-date standards are referred to. Policy C6 para. f) *...and respond to local character and design standards as set out in the Oxfordshire County Council Street Design Guide (or future equivalent standards);*

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Paragraph h) Within Draft Policy C6, outcome h) including e-bike/e-cargo bike charging would support the growth of e-bikes and e-cargo bikes. LTCP policy reference It would be helpful in Draft Policy C6 if it also references how this policy will support LTCP policy to remove 1 in 4 car trips by 2030 and 1 in 3 by 2040 and reduce vehicle mileage. Travel Plans and TA's should actively show how they will be supporting this policy, this will also support the monitoring of Travel Plans. Travel Plans and health benefits The County Council recommends the following addition to Draft Policy C6: "Travel Plans should incentive sustainable travel and support the delivery of cycle training for children, adults and families to support positive travel choices and provide health benefits to local communities."	Paragraph h) The plan already includes a policy which references electric vehicle charging. LTCP policy reference The LTCP is the statutory transport plan for Oxfordshire. As such, there is no need to duplicate its content. Especially as this may be subject to change/ review as and when future iterations are delivered. Travel Plans and health benefits The Plan already includes Policy HD7 – Health Impact Assessment to assess impacts of development proposals. The proposed text does not impact the soundness of the plan.	Paragraph h) No change proposed (as agreed at Reg. 18) LTCP policy reference No change proposed (as agreed at Reg.18) Travel Plans and health benefits No change proposed.
C6	**Place Planning and TDM Teams (Central)** General comment	General comment	General comment

3354

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	The County Council fully supports the requirement for transport assessments to assess the multi-modal impacts of development proposals. The County Council's LTCP includes a transport user hierarchy to ensure future schemes consider walking, cycling, public and shared transport before the private car. It is important that development proposals also consider development impacts and any mitigation in this order too. <u>Inclusion of reference to LTCP Policies</u> The County Council notes "*The requirements for the transport assessment and travel plans are set out in Oxfordshire County Council's document Implementing Decide and Provide in Transport Assessments.*" Whilst this is helpful, it doesn't include this text in the policy wording itself. We think it would be incredibly helpful if specific reference to the County's Implementing Decide and Provide was included and worded as follows: *All major development proposals must demonstrate that the methodology in Oxfordshire County Council's Implementing Decide and Provide:*	General comment noted <u>Inclusion of reference to LTCP Policies</u> The LTCP is the statutory transport plan for Oxfordshire. As such, no need to duplicate its content. Especially as this may be subject to change/ review when the next iteration is delivered.	No change proposed (as at Reg. 18) <u>Inclusion of reference to LTCP Policies</u> No change proposed (as at Reg. 18)

3355

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Requirements for Transport Assessments document has been used to assess the need for infrastructure and provision of transport services. Vision-led approach to transport planning Further to this, the glossary at Annex 2 (p.80) of the NPPF describes a vision-led approach as: *…an approach to transport planning based on setting outcomes for a development based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity (often referred to as 'predict and provide').* When these changes to the NPPF were initially proposed it was stated in the supporting text for the accompanying consultation that (Chapter 8, paragraph 7, MHCLG), "*To support the implementation of this updated policy, we will publish updated guidance alongside the policy coming into effect.*" At the time of writing, this guidance remains forthcoming. Thus, in the	Vision-led approach to transport planning The NPPF (December 2024) already sets out that a vision-led approach to transport planning should be considered. Having considered whether to make a reference to this in the plan, the City Council considers that National Policy and existing Policy contained within the LTCP is sufficient and does not need to be repeated in the city's Local Plan.	Vision-led approach to transport planning No change proposed.

3356

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	context of this description of the vision-led approach and in lieu of the updated guidance, the Implementing Decide & Provide document should be seen as the methodology that development proposals within Oxfordshire must follow in order to meet the requirement set out in paragraph 118 of the NPPF. However, it is expected that, once the updated guidance is made available, the County's Implementing Decide & Provide will be complementary to the national guidance and will remain necessary in setting out local requirements to ensure that a vision-led approach to transport planning has been followed.		
C7	**County Councillors** County Parking Standards The County Council welcomes the reference to the Oxfordshire County Council parking standards however we would like to request that the wording of the policy is such that it can reflect that these standards will be reviewed on a regular basis. Therefore, we encourage the City Council to make reference to the	County's Parking Standards As the city's parking standards are required to support decision making, it is helpful for them to be included within an adopted Local Plan. While standards do change from time to time, we need to produce a new local plan every five years so we would be review and update the standards as appropriate.	County's Parking Standards No change proposed (as agreed at Reg. 18)

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
3358	County Council parking standards with an open wording, noting the need to refer to the County as the Highway Authority for the latest standards, instead of including them as an Appendix to the City Plan. **Transport Policy** <u>Importance of well-lit and inclusive cycle parking</u> Incorporating the importance of lighting should be added. The paragraph relating to bicycle parking ("Cycle parking should be well designed and well-located, convenient, secure, covered (where possible enclosed) and provide level, unobstructed external access to the street.)" should also include that cycle parking must be "inclusive" and "well lit". Modification: add the following text (in bold) to the policy: *"Cycle parking should be well designed,* ***<u>inclusive</u>*** *and well-located, convenient, secure,* ***<u>well-lit,</u>*** *covered (where possible enclosed) and provide level,*	<u>Importance of well-lit cycle parking</u> The policy already makes reference to "well designed", "well-located", and "secure" cycle parking. We consider that the addition of the phrase "well-lit" to the policy is superfluous. Well-lit cycle parking, along with a range of other cycle parking design considerations such as natural surveillance and overlooking are key components of well designed, well-located and secure cycle parking facilities. As such the policy does not need to explicitly make reference to "well-lit" cycle parking. It is worth noting that the County Council's Street Design Guide also highlights that not all streets require street lighting, providing examples of where the provision of lighting may be detrimental. Examples relevant to Oxford city relate to wildlife and/or bat corridors. <u>Importance of inclusive cycle parking</u> Policy C7 already sets out that cycle parking should be designed to accommodate cycle parking for a wide	<u>Importance of well-lit cycle parking</u> No change proposed <u>Importance of inclusive cycle parking</u> No change proposed

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	unobstructed external access to the street".	range of users. There is no need to include the word "inclusive" in the preceding paragraph given the range of user groups to which the policy already applies.	
C8	<u>General comment</u> The current car parking policy for non-residential uses within LP 2036 (policy M3), in the case of the redevelopment of an existing or previously cleared site, was that: *"there should be no net increase in parking on the site from the previous level and the Council will seek a reduction where there is good accessibility to a range of facilities".* <u>Increase of Parking</u> 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. <u>Retain current policy</u> 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	<u>General comment</u> General comment noted. <u>Increase of Parking</u> Any increase in parking would need to be justified in accordance with a submitted TA. <u>Retain OLP2036 policy</u> The principles set out within Policy C8 (i.e., no additional car parking (except for blue badge and servicing) and to seek a reduction in car parking at accessible sites) apply to all non-residential sites (and factor in their accessibility). We could include a reference to a TAN to provide further technical advice for this policy.	<u>General comment</u> No proposed changes (as at Reg. 18) <u>Increase of Parking</u> No proposed changes (as at Reg. 18) <u>Retain OLP2036 policy</u> We proposed the following minor modification to the supporting text. Create new (final) bullet point under Policy Implementation Heading:

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	congested and sensitive to changes in traffic flow. Therefore, the existing policy should be retained. Modification: Retain existing policy that requires no net increase in car parking and for this to be demonstrated through the TA.		• *Further details may be provided in a Technical Advice Note.*
I2	Support of this Policy	Support noted	No change proposed
CBLAOF	Typos/ Clarifications/Syntax etc. Amend the following bullet points as follows: c) A reduction of car parking in line with Policy C8 o) Financial contributions from trip-generating uses within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city's boundaries) towards achieving public transport enhancements in this area, including, among other sustainable transport measures, **and** the delivery of the CBL.	Re: bullet point c), this looks like a missing word. We will update with an appropriate word. o) the addition of the word "and" in this context is not an acceptable change as it seems to unintentionally disaggregate CBL from "other sustainable transport measures…" Change not accepted in this instance	Minor modification proposed to clarify the syntax of bullet point c): *c) A reduction of car parking in line with Policy C8* No proposed change to bullet point o)
SPS3	**Policy SPS3 – Bertie Place Recreation Ground** LNRS mapping extent It is noted that only part, rather than all, of this site is within the mapped area of the LNRS.	LNRS mapping extent Having reviewed both the extent of the site allocation and the LNRS mapping, the whole of the Bertie Place LP2045 Site Allocation area is contained within the	LNRS mapping extent No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Modification: update policy box to reflect that part of site is included within the LNRS <u>Consistency with published LNRS</u> Reference to the LNRS should be reviewed now it has been published and updated as appropriate across all allocation sites. <u>Site-specific ecological considerations</u> Suitability for slow worms has been identified for this site. Bats may also be present within the buildings present along with other species such as otters due to the close proximity of a number of watercourses. It is requested that all sites are assessed in this way for their suitability to support protected species if this approach is used here for consistency.	mapped area of the LNRS mapping. As such, the policy box is accurate. <u>Consistency with published LNRS</u> All site allocations have been reviewed against the final published version of the LNRS. Appropriate references have been included within relevant policies in the Plan. This was done as part of the preparation for Reg. 19. <u>Site-specific ecological considerations</u> All sites were reviewed by relevant city council specialist officers as part of the site allocation process, and their findings incorporated as part of the policy drafting process. We are confident in our approach.	<u>Consistency with published LNRS</u> No change proposed <u>Site-specific ecological considerations</u> No change proposed
SPS7	<u>Policy SPS7 Kassam Stadium</u> Reference should be made to all documents that make up the LNRS as well as the mapping tool for all sites, including this one, where applicable.	We consider that the references to the LNRS contained within the site allocation policies to be sufficient.	No change proposed
SPS11	<u>SPS11 Overflow Car Park at Kassam Stadium</u>	See response to H1 (above)	No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	The Overflow Car Park at Kassam Stadium (Policy SPS11) refers to a minimum capacity of 100 new homes however this is based on a capacity study which assumes as density between 60–80dph. Given the site's location and urban nature, the County questions if a density of 80dph on the overall should be applied, in order to maximise the use of the site in line with Policy HD2, thereby reducing the amount of housing unmet need.		
SPS12/ E1	<u>SPS12 Oxford Science Park</u> It is noted that a number of the proposed allocations in the plan, such as SPS12 (Oxford Science Park) recognises that a level of housing could be acceptable within the site however no capacity study or indication of minimum capacity has been undertaken.	<u>Housing at employment sites</u> Some site allocations (e.g., SPS12 Oxford Science Park), are allocated for employment-generating uses. However, Policy E1 – Employment Strategy introduces a permissive approach to residential development across the city's employment site network. While landowners of employment sites generally welcomed the ability to deliver residential uses at their sites, they also supported the flexibility that the permissive approach provided. The City Council considers that the permissive approach to housing on employment sites is the correct approach. This is because it allows landowners to respond quickly to changing economic circumstances (NPPF para. 86(e)). Where housing numbers are included within site allocation policies,	No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		these have been through a process in accordance with national policy to ensure that the homes are deliverable within the plan-period. The Housing Requirement already includes a "windfall" allowance for additional homes that are delivered on sites outside of those specifically identified for residential development in the plan. In terms of the anticipated supply calculations for the plan-period, any new homes coming forward on sites identified within the city's employment site network would be captured as windfalls. The Strategic Housing Land Availability Assessment (SHLAA) sets out how the windfall housing allowance has been factored into the overall capacity calculations. Both small (1-9 dwellings) and large (10+ dwellings) sites make up the overall windfall allowance. The windfall allowance is based on past trends, which have been extrapolated forward. One source of housing within the windfall allowance is conversions from commercial land to housing (including permitted development rights for office to residential conversions). The assumption therefore is that a portion of the windfall housing allowance, both from small and large sites, will come from commercial conversions. We consider that this approach is defensible, justified, and PPG compliant.	

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
SPS16	Site capacity Although the capacity study prepared for this site acknowledges that there is possibility for additional heights within the site, it is unclear if the defined capacity reflects this potential. Policy should contain a reference to supporting a library In addition, consideration should be given to the explicit mention of supporting a library relation into this site as part of the required "Community facilities". Modification: *"Development should include residential development and town centre uses that provide active frontages at ground floor level. The range of town centre uses could include the following:* *• Retail;*	Site capacity The capacity assessment for this site sets out how site capacity (no. of dwellings) has been arrived at. In calculating the residential capacity of the site, higher residential density assumptions have been used than those contained within Policy HD2 (i.e., 100dph for city/district centres). The capacity assessment clearly sets out the assumptions for block heights and massing that have been used in coming to the residential capacity for the site. Given the site is less than 4ha and is allocated for a mix of uses including residential, the 500 dwelling (net gain) in residential dwellings at the site represents a very high-density development. Policy should contain a reference to supporting a library The Infrastructure Delivery Plan (IDP) sets out the required infrastructure needed to support the growth identified in the plan. We question the need for library provision on-site, especially given the proximity of the site to Cowley Library (less than 800m away). If improvements to Cowley Library are needed to mitigate the impacts of new development, these should be costed (and identified) in the IDP. However, we can suggest a modification to Policy SPS16 to include the phrase 'and services', to the Community facilities bullet point, if this would be helpful.	Site capacity No change proposed Policy should contain a reference to supporting a library Amend Policy SPS16 to include the phrase 'and services' in relation to the community facilities use: *"Development should include residential development and town centre uses that provide active frontages at ground floor level. The range of town centre uses could include the following:* *• Retail…* *• Community facilities and services;*

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	• *Commercial leisure;* • *Financial and professional services;* • *Learning and educational uses;* • *Evening economy uses such as cafes, restaurants and pubs;* • *Community facilities;* ***including the potential for library provision****.* Policy should cross-reference Policy HD2 *The minimum number of dwellings to be delivered is 500 (net gain)".* ***Maximised densities, including for higher buildings, should be demonstrated in line with policy HD2.***	Policy should cross-reference Policy HD2 There is no need to cross reference Policy HD2 in this policy.	Policy should cross-reference Policy HD2 No change proposed
SPE2	It is stated that this site has potential for conservation interest. Further detail should be provided to explain this.	A phase one habitat survey was carried out for this site in 2025 and is included in Oxford City Biodiversity Surveys 2025 document. The initial survey found limited biodiversity interest of low distinctiveness. There seem to be no showstoppers to prevent allocation or to influence design, but a more detailed survey will be needed to support any application.	No change proposed
SPE3	A biodiversity survey is stated as required for this site, but this has not been stated as a requirement for all sites. For consistency and in compliance with policy G6, without knowing the details of what is proposed and present at each site allocation, all site allocations may have the suitability	For the draft plan we need to be satisfied that a development is likely to be able to come forward in a way that meets the requirements of the site allocation policy. Ecology officers have carried out a desktop survey of all the site allocations and flagged things that may affect how the sites are delivered, and also cases where further survey work may be needed.	No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	to support protected and notable species. It is therefore requested that an ecological assessment is undertaken for all site allocations.		
SPCW6	It is stated that the site contains 'Section 41 (Priority/Principal) habitats'. An ecological assessment of will therefore be required to determine the extent of these habitats and help determine whether the target minimum number of dwellings is achievable in line with policy G6.	We are satisfied that we have understood the constraints on this site in drafting the policy. To accompany an application, a detailed ecological assessment will be required.	No change proposed
SA	Potential for legally protected species Regarding SA objective 10 criteria included in Table 3.14 it is noted that 'Potential for legally protected species to be present' is included in the minor negative section. It should be assumed that all site allocations have the potential to support legally protected species until detailed ecological surveys have been undertaken. This would mean that almost all sites would fall in at least the minor negative category. Individual SA site assessment scoring (SA Objective 10) It is noted that a number of site allocations including SPN1 have been	Potential for legally protected species As part of the plan-making process, proposed site allocations have been reviewed by specialist officers at the City Council. Where specialist officers considered that sites had the potential for legally protected species to be present, these sites were highlighted, along with a rationale as to why certain species could be present. Individual SA site assessment scoring (SA Objective 10) The scoring system (SA Framework) that was developed to inform the SA site assessments was	Potential for legally protected species No change proposed Individual SA site assessment scoring (SA Objective 10) No changes proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	assessed as a minor positive impact regarding SA10 despite it being identified that the site may have suitability to support protected species.	consulted on at Reg. 18. (See Interim SA Report – Part One (Scoping) for further details. Table 5.11 of the Interim SA Report sets out the SA decision-making criteria supplements this with site scoring criteria in relation to SA Objective 10. The County Council made no comments on the proposed SA Framework for sites at Reg.18. At the Reg. 19. Consultation Stage, the Reg. 19 SA Report references the SA Framework for sites at Section 3.4.2. The Reg. 19 SA Framework for sites relates decision-making criteria to each SA Objective and then provides scoring criteria that are in turn related to the decision-making criteria. Section 5.3 of the Reg. 19 SA Report includes an account of the SA process involved in the allocation of sites in the plan. Not all sites fall neatly into one of the SA Scoring criteria (e.g. there may be some potential for protected species on a site, but also opportunities for improving wildlife linkages to neighbouring sites). As such, in some instances, City Council planning officers have needed to apply a degree of professional judgement when assessing each site against the decision-making criteria. In fact, the pro-formas were specifically designed to enable City Council planning officers to be able to set out a short narrative to accompany the scores attributed to relevant SA objectives.	

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		The SA site assessment scoring undertaken by City Council planning officers, was informed by additional information from a range of sources. This included in-house advice from specialist officers (including archaeology, land contamination, ecological features and biodiversity potential). The scores, in some instances were also informed by more detailed site-specific information, where this was publicly available.	
	<u>Reference to priority and irreplaceable habitats</u> Reference to priority and irreplaceable habitats as well as priority species would be welcomed when defining the criteria included in Table 3.14 regarding SA10.	<u>Reference to priority and irreplaceable habitats</u> As set out above, the pro-forma was consulted as part of the Reg. 18 Interim SA Report. We are not proposing to update the SA Framework at this stage. It should be noted that these forms are intended to support developing the policies alongside other tools such as the site capacity assessments. Where particular areas of recorded habitat/biodiversity value were identified on sites as drafting of the allocations took place, officers have sought to flag this through the allocation's requirements as something applicants will need to consider.	<u>Reference to priority and irreplaceable habitats</u> No changes proposed
	<u>Reference to LNRS</u> Reference to the LNRS would be welcomed when defining the criteria included in Table 3.14 regarding SA10 and consideration should be given as to whether inclusion of developments within mapped areas of the LNRS are considered positive or negative.	<u>Reference to LNRS</u> The individual site allocations policies were reviewed to take account of the LNRS opportunity areas. These have been highlighted in relevant site allocation policies. We do not consider that a site's location within an opportunity area would significantly alter a site's SA score in relation to this objective. Elements of the LNRS layer (i.e., designated ecological sites which	<u>Reference to LNRS</u> No changes proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Where site allocations fall outside of the mapped areas of the LNRS, the unmapped measures within the LNRS still present an opportunity for ecological enhancements to be delivered in line with strategies' priorities. <u>Various site scores questioned:</u> <u>Policy SPS8</u> It should be clarified whether SPS8 allocation is a proposed Local Wildlife Site and/or Oxford City Wildlife Site. <u>Policy SPS14</u> SPS14 is located within 100m of a nationally designated wildlife site and should therefore be assigned minor negative impact regarding SA10. <u>Policy SPE3</u> SPE3 is located within 200m of a Local Wildlife Site and should therefore be assigned neutral impact regarding SA10. <u>Policy SPE5</u> It is noted that the extent of priority lowland deciduous woodland habitat is	are identified as existing sites of biodiversity importance) have already been captured within the assessment process. We are not proposing to alter the SA Framework. <u>Various site scores questioned</u> On various sites, the County Council appears to be disputing the scores attributed through the SA site assessment process. This is not something that is normally debated through the examination process. As such, we acknowledge the response made on this issue however, no changes are proposed.	<u>Various site scores questioned</u> No changes proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	not yet known within the SPE5 allocation site. This should be confirmed. Clarification should also be provided to explain the phrase 'The site boundary contains Section 41 (Priority/ Principal) habitats that fall within the LPA Biodiversity Duty'. <u>Policy SPE16</u> Under site allocation SPE16 a number of ecological enhancements are listed which appear to be from the LNRS. A consistent approach outlining suitable/possible mapped and unmapped priority measures from the LNRS for each site would be welcomed.		
HRA	<u>Pollutants</u> While it is appreciated that nitrogen oxides and ammonia are important pollutants affecting vegetation, it is requested that other pollutant gases such as sulphur dioxides, ozone and particulates are also acknowledged and considered. This approach also applies to water quality pollutants where only two pollutant types have listed. <u>West Oxfordshire District Council Plans</u> Justification should be provided to explain how West Oxfordshire plans	<u>Pollutants</u> The HRA Screening Report sets out the rationale for assessing the identified pollutants (both in relation to air and water quality). <u>West Oxfordshire District Council Plans</u> In terms of air quality (traffic modelling) impacts, as the County Council is aware, the development proposed in	<u>Pollutants</u> No change proposed <u>West Oxfordshire District Council Plans</u> No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	have been considered when assessing in combination effects of air quality and water quantity.	the extant West Oxfordshire Local Plan is already contained with the Oxfordshire County Council Transport Model. A detailed explanation is provided in the HRA Screening Report (published at Reg. 18 and Appendix A of the Reg. 19 HRA Report). In terms of water quality, the most recent publicly available water cycle studies for all surrounding districts were reviewed as part of the Reg. 19 HRA Report.	
	<u>Further Justification – Screening Decisions – other SAC's with 10km</u> Further justification should be provided to explain the scoping decision regarding Cothill Fen SAC and Little Wittenham SAC.	<u>Further Justification – Screening Decisions – other SAC's with 10km</u> The HRA Screening Report already provides evidence as to why these two SACs have been screened out from further assessment.	<u>Further Justification – Screening Decisions – other SAC's with 10km</u> No change proposed
	<u>Further evidence – Recreational impacts buffer zone</u> Further evidence should be provided to justify the scoping decisions made regarding recreational impacts and the distance used of 1,900m, particularly considering how residents may choose to travel to greenspaces through other types of transport other than walking from within Oxford.	<u>Further evidence – Recreational impacts buffer zone</u> The 1,900m buffer zone is considered suitably precautionary. It was based on a historic study which suggested that people in Oxford were willing to travel to large greenspaces on foot. As *A. repens (creeping marshwort)* is not sensitive to trampling but is sensitive to increased nutrification associated with dog-fouling, it was considered that most dog-walkers associated with new development choose to walk their dogs (rather than to take their dogs on other modes of transport). This is all set out in the Reg. 19 HRA Report.	<u>Further evidence – Recreational impacts buffer zone</u> No change proposed
	<u>Further evidence – visitor numbers</u>	<u>Further evidence – visitor numbers</u>	<u>Further evidence – visitor numbers</u> No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Further evidence should be provided to justify the conclusion made that 'There is no indication that current visitor numbers are having a detrimental effect on the condition of Apium repens at the Oxford Meadows SAC'. Section 8.22 - conclusions Justification and explanation should be provided for the conclusion made in section 8.22.	We consider that the evidence provided in the HRA is sufficient to justify these conclusions. Section 8.22 - conclusions Paragraph 8.22 considers the water quality 'in-combination' effects and provides a high-level review of published Water Cycle Studies for each of the other Oxfordshire districts. While WWTW capacity issues are noted in all districts, each Oxfordshire district authority has been working with Thames Water to resolve development constaints. Final note on HRA We have involved Natural England at every stage of our HRA and we have a signed statement of common ground with Natural England to support the conclusions presented in the Reg. 19 HRA Report that the Oxford Local Plan 2045 is not likely to have significant effect on the integrity of the Oxford Meadows SAC, either 'alone' or 'in-combination' with other relevant plans and programmes.	Section 8.22 - conclusions No change proposed

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South Oxfordshire District Council and Vale of White Horse District

Summary of Comment in South Oxfordshire DC and Vale of White Horse's representation	Oxford City Council response
Policy S1 Criteria e says "Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere". 'Prioritising housing elsewhere' is quite ambiguous. Also as written this criterion could apply to all current employment sites, whereas Policy E1 which distinguishes between the two types of employment sites, and it permits some housing on Key Employment sites. Also, we believe that a criterion for delivering housing is an omission within the policy. Change from "e) Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere". To "e) Focus new employment development on Key Employment sites, redeveloping and intensifying to make best use of those sites and permit housing delivery where justified". Add new criteria "x) Prioritise housing across the city, redeveloping and intensifying centres and densifying the suburbs, to make best use of land".	Modifications are proposed to S1 to make it clearer that housing is prioritised. A new bullet point (e) is proposed that says 'prioritise new homes in all suitable and sustainable locations'. The last part of bullet point (e) (that will become f)) was intended to make this clear, but we agree on reflection that it would be clearer as its own bullet point. Proposed modifications as follows: ...To help achieve this it will aim to ensure development is located to: ... e) Prioritise new homes in all suitable and sustainable locations; ~~e~~f) Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere; ...
Policy S3 At the Preferred Options stage we raised concerns about the lack of justification for the 1,500m buffer zone for collecting financial contributions related to the Cowley Branch Line. No new justification has been provided. The policy is also not effective because it does not state clearly that it applies within	It is agreed that a change to the wording of S3, to bring it in line with the CBLAOF Policy wording, would be helpful. Proposed Modification to S3: Supporting existing public transport and the reopening of the Cowley Branch Line to passengers would enable a reduction in car use to this area. Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city's boundaries) will be expected in order to achieve public transport

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the City administrative boundary, which leads to uncertainty. To make the policy effective, the clarity contained within Policy CBLAOF (Cowley Branch Line Area of Focus) "where it falls within the city's boundaries" should be added to Policy S3 as follows: "... Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city's boundaries) will be expected in order to achieve public transport enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL."	enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL.
Chapter 1 Vision and Strategy The Vision is generally positive, however it provides limited support for delivery new homes and affordable housing within the city. As a result, the protection of assets appears to be prioritised over delivery of homes.	The very start of the Vision talks about healthy and inclusive communities and access to housing. Furthermore, the first two objectives are: • Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all. Therefore, the City Council does not agree that there is limited support for delivery of new homes and affordable housing or that protection of assets is 'prioritised' over delivery of new homes. It is acknowledged that there are many elements of creating a successful city, some of which will involve protections. The City Council proposes no modifications in response to this comment.
Policy H2 Delivering Affordable Homes At the Preferred Options stage, we raised several concerns with the Specialist Housing Needs Assessment. The consultation statement dismisses many of our requests for data and sources. As a result, we have a number of concerns about the transparency of data sources and methodology used in the assessment which remain unresolved.	South Oxfordshire and VWHDC have confirmed that their concerns raised at Regulation 18 largely still stand. The concerns are set out in a separate table for South Oxfordshire and VWH DC in the 'Supporting documents, general and other comments' section of the Regulation 18 Consultation Report, with responses to each listed concern from the City Council. The City Council does not propose further changes to this piece of evidence.

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Policy H1 Page 2 of this chapter includes some policy implementation bullet points. The final bullet point should be amended to reflect that the City Council and neighbouring authorities are working together to deliver housing, rather than the sites themselves. We recommend the following modification: Change from "The council is continuing to work with adjoining authorities to deliver sites in adjoining districts to help meet Oxford's housing needs to address the unmet housing need." To "The Council is continuing to work with adjoining authorities to deliver housing in adjoining districts to help meet Oxford's housing needs to address the unmet housing need."	The City Council continues to think the reference to sites is relevant and appropriate. In most cases, unmet need is intended to be delivered on specific and known sites. The City Council liaises with district councils about those sites. Reference to sites in this context is not considered unsound.
To make the map effective, no policy designations should appear outside the Local Plan area. The plan's policies do not apply outside the plan area. Currently, both the interactive and PDF maps indicate that policies I2 (East West Rail) and I2 (Oxford Flood Alleviation Scheme (OFAS)) are safeguarded in neighbouring districts and that Policy G6 (Local wildlife sites) applies outside Oxford's boundary. The map shows significant tracts of land within the Vale of White Horse district between Kennington, South Hinksey, and North Hinksey safeguarded for OFAS, as well as numerous local wildlife sites in both South Oxfordshire and Vale of White Horse.	A modification is proposed to the Policies Map to cut layers off at the city boundary.
In the Infrastructure Delivery Plan, the section related to water supply and wastewater ends abruptly at paragraph 7.57, which appears to be a publishing error. The missing information may be relevant to our districts as we share the same Oxford Sewage Treatment Works catchment. We ask that this	The last sentence from paragraph 7.57 of the IDP should read as follows: However, should rates of house-building increase in the area serving the Oxford WWTW (in line with national Government ambitions to deliver 1.5million homes), this could result in a need

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section is reviewed and shared with us as soon as is possible.	for the "additional upgrades" (i.e., the upgrades that are required to accommodate the level of growth proposed after 2041) to be delivered sooner.

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Cherwell District Council

Summary of Comment in Cherwell District Council's representation	Oxford City Council response
Housing need and requirement We would welcome a clear table with the number of homes to be delivered and when. The capacity-based context of the OLP should also be explained within the Local Plan, including delivery or the housing requirement and the housing trajectory.	This trajectory was included in the Plan in support of H1 . This will be updated as the SHLAA is updated, ahead of submission. Considering some additional text about unmet. The SHLAA does provide greater details on delivery, not all of which need to be in the Plan. A mod is proposed to add information about unmet need to the 4th bullet of the Context section of H1, as follows: Oxford's unmet housing need is therefore 12,473. The surrounding Oxfordshire districts have formally agreed to meet this need, with the following distribution:

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Employment need Policy E1 would benefit from greater clarity in the interest of usability and to ensure that appropriate opportunities are not overlooked. The approach to B8 in Policy E2 should be more flexible to sustainably support logistics operations within the city boundary to meet Oxford's needs.	A modification is proposed to Policy E1 to make it clearer (no change to meaning, just presenting it differently): ~~Outside of these locations:~~ On existing employment sites or those in lawful use for the proposed employment use class, which are outside the city centre or district centres, and which are not designated as Key Employment Sites, proposals for regeneration and/or additional floorspace with employment-generating uses will only be supported if: a. ~~Existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), can only be regenerated with employment generating uses if~~ better and more intensive use is made of the site through the redevelopment, upgrading or re-use of existing under-used buildings, and b. ~~Proposals for additional floorspace for employment generating uses on existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), outside the city and district centres must follow~~ the sequential approach is followed for new town centre uses as set out in Policy C1.
Employment Land Needs Assessment (ELNA)	We will update the dates of the ENA in the ELNA.

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It should be noted, for accuracy, that in Table 2.1 of the ELNA the period which is covered by Cherwell's ENA is 2020-2042, rather than 2021-2042. The ELNA recognises that may of Oxford's employees travel in from neighbouring authorities and this pattern will be exacerbated, and community will increase unless significant residential development is delivered within the city and land suitable for housing development is not unreasonably lost for employment. The large pipeline of R&D (recognised in the ELNA) in advance of housing will impact commuting levels. Paragraph 5.60 suggests that industrial/warehousing space is accommodated outside the city and refers to locations within Cherwell. It is not clear if it is being indicated that Oxford's warehousing need is being met by these locations, but we anticipate that Policy E2 will address this.	Paragraph 5.60 is in the Property Market Analysis section. This paragraph is simply noting the current situation, which is that there is not demand in the city and the because the city does not see any large strategic warehousing, due to the lack of available suitable sites, with these requirements accommodated outside of the city in places such as Symmetry Park, Bicester and Central M40 at Banbury. Paragraph 5.88 concludes this section and notes that the city's industrial/warehouse market is relatively small. Paragraph 8.21 summarises the overall need for employment floorspace in the city as follows: *we do not recommend a need to identify land for the modest office, industrial and warehousing need because growth in these uses can be absorbed in the existing portfolio. The considerable minimum need for R&D/lab space (the 345,000 sq m) can be met from within the committed and potential supply that has been promoted to the Council.* The City Council is therefore making no request for any neighbouring district to take any kind of employment need.
Areas of Focus (NEOAOF) We would welcome greater clarity on the sites within Cherwell that are allocated in the Cherwell Local Plan Partial Review to meet Oxford's housing needs (PR6a, PR6b, PR7a, PR7b, PR8 and PR9). A correction is also needed to the supporting paragraph to Policy NEOAOF as site PR6c (Land at Frieze Farm) is not a housing site	Modification suggested to the reference to Frieze Farm in the supporting text of Policy NEOAOF: The area adjoins several large housing allocation sites, which fall within Cherwell District (PR6a Land East of Oxford Road, and PR6b Land West of Oxford Road ~~and PR6c Land at Frieze Farm~~) but nonetheless adjoin existing communities in Oxford...

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is reserved only for the potential construction of a golf course should this be required as the result of the residential development of Land to the West of oxford Road under Policy PR6b (North Oxford Golf Course). A criterion should be added to make clear that any development within the AoF will be expected to support (and not undermine) the delivery of nearby sites PR6a, PR6b, PR7a and PR7b and not delay their delivery in meetings Oxford's housing needs.	Amendment to bullet point f of Policy NEOAOF **High quality design which capitalises opportunities for growth** e. Good urban design and place making across the AoF, including the introduction of new public open space; f. Successful integration of new development into the existing built environment, consideration of longer-term potential for integration with unmet need sites in Cherwell (without harming their delivery) and enhanced facilities for both new and existing communities.
Open space, recreation and playing pitches It is not clear how the assessment of open space, recreation and playing pitch needs within the city has been used to inform the assessment of sites in the HELAA 2026 and the allocation of sites in the OLP2045. Further clarity may be helpful. We note that there is not evidence on golf needs in the interim PPS 2026. It is important that this gap in the evidence is addressed considering the allocation of the North Oxford Golf Course by Cherwell for housing development and the reservation of Frieze Farm for an	It is not considered that the lack of golf in the PPS means there is a gap in the evidence that needs to be addressed. The PPS focuses on pitches, which host sports with various associations and clubs, and in some case may be able to be turned over to alternative pitch use depending on demand. Golf is very different. The City has only one golf course and one driving range that is not within a private school or college. At the current time, the landowners have not put these site forward for development and there is no intention for them to be lost and therefore to need to be reprovided elsewhere (or shown to be surplus). It is also highly unlikely that there could be potential within the City for another golf course.

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alternative golfing facility should this be required to meet need.	The Playing Pitch Strategy does not suggest an excess of sports pitches, and these sites are not considered surplus. They are allocated for housing because a detailed consideration of the site and discussion with landowners suggests that there is potential to re-provide sports provision (in nearly all cases within the site, intensifying it into a smaller area) allowing housing to come forward on the remaining space that has been freed up. At the current time the landowners of the OUP sports ground and Jesus and Lincoln College do not have alternative, suitable off-site provision that they have identified. However, this could potentially be identified over the course of the plan, which would increase the capacity of the sites. The capacity assumptions for the plan though need to be on the basis of what is known to be achievable and deliverable, rather than what it may be hoped could happen by the end of the plan period.
Green Belt The Green Belt assessment of additional sites 2025 carried out by LUC and published alongside the consultation focuses on whether any of the previously assessed sites meet the criteria for 'grey belt' The starting point for this study appears to be the earlier work, also undertaken by LUC. Therefore, there might be other opportunities within your area of the Green Belt (e.g. to	It is not the case that the 2025 Green Belt assessment of additional sites focuses on sites previously assessed by LUC. The latest assessment does revisit previously assessed sites, to ensure the assessment is up-to-date according to the revised NPPF, and it identifies which of these previously assessed sites are grey belt. In addition, there are also a number of new sites assessed, which had not previously been assessed. New sites were included to ensure compliance with the intention of the NPPF- sites were only

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provide affordable housing). Bearing in mind the development pressure on adjoining authorities, it would be helpful if the circumstances in which Oxford would consider meeting its development needs within its parts of the Green Belt could be clearly set out.	excluded from review if they were greenfield sites where the amount of Flood Zone 3b means they are intrinsically not developable, or where they have national biodiversity protections, which also makes them intrinsically not developable. Sites with local wildlife protection or other designations were not excluded from review, as they had been previously, and so there are additional sites assessed. A few sites were identified where development may have the potential to have a fundamental impact on the Green Belt purposes. A number of parcels (some newly assessed and some revisited) were found to be grey belt. Whatever the outcome of the Green Belt assessment, all sites (other than those already identified as having intrinsic constraints) were still considered further. However, on application of the plan's strategy and other further considerations, such as landowner interest, very little potential was found in the Green Belt, with only one site being allocated. The Evidence Base has been assessed but this does seem to be set out in the Green Belt Assessment 2025 and this is set out clearly in Background Paper BGP006: Green Belt, which says in paragraph 3.2: *The first stage of the most recent assessment required Oxford City Council to determine the location, scale and most appropriate parcel size as set out in the Paragraph 003 (Reference ID: 64-003-20250225) of the PPG. All green sites including those in the Green Belt are already in the Council's Strategic Housing Land Availability Assessment (SHLAA), therefore it was considered that any SHLAA*

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	site which contained any Green Belt would be looked at in the first instance. This resulted in an initial 121 parcels of or including Green Belt (one was subsequently split into two for allocation purposes), which can be found in Appendix 1 of this background paper

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Summary of Comment in West Oxfordshire District Council's representation	Oxford City Council response
Policy S1- spatial strategy and presumption in favour of sustainable development Whilst generally supportive of Policy S1, we suggest that the Local Plan should avoid unnecessary repetition of national policy regarding the presumption in favour of sustainable development. This will also avoid Policy S1 becoming quickly out-of-date against the new NPPF. Also concerned Policy S1 does not reference the importance of maximising the delivery of new homes in suitable and sustainable locations. Given the capacity-based housing requirement, there must be explicit commitment to maximising delivery of new homes.	Modifications are proposed to S1 to avoid repetition of the presumption in favour of sustainable development. Also, a new bullet point (e) is proposed that says 'prioritise new homes in all suitable and sustainable locations'. The last part of bullet point (e) (that will become f)) was intended to make this clear, but we agree on reflection that it would be clearer as its own bullet point. Proposed modifications as follows: Amend policy title on page 10 and heading on page 9 as follows: Spatial Strategy ~~and Presumption in Favour of Sustainable Development~~ Policy S1: Planning permission will be granted where development proposals accord with the policies of the Plan taken as a whole. Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise. The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can be approved wherever possible, to secure development that improves the economic, social and environmental conditions in the city The City Council, through its policies and decisions, will positively pursue sustainable development and achieve sustainable growth in the delivery of homes, jobs and services to create a network of healthy, well-connected, high-quality areas where people want to live, play, learn and work in line with the vision and objectives of the Local Plan. To help achieve this it will aim to ensure development is located to: ... e) Prioritise new homes in all suitable and sustainable locations;

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	~~e~~f) Focus new employment development on existing sites only, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere; [Re-number what were criteria f, g, h, i and add new criterion j:] j) Support the health and wellbeing of local communities such as by delivering new sports and recreation facilities or enhancing existing provision. When determining development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). ~~The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can be approved wherever possible, to secure development that improves the economic, social and environmental conditions in the city.~~ ~~All new proposals for development must conform with the principles of securing sustainable development, which ensures that the city is ready for a net zero carbon future, natural resources and raw materials are used prudently and considerately, the air quality of the city is improved, and human health is safeguarded.~~ ~~Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in any neighbourhood plans adopted in the future) will be approved without delay, unless material considerations indicate otherwise.~~ ~~Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise, considering whether:~~ ~~i) The application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or~~ ~~j) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.~~

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Policy H1- Housing requirement No concerns with the principle of a capacity-based housing requirement, but note that the per annum supply assumptions fell from 481 homes per year in the withdrawn OLP2040 to 463 homes per annum in the OLP2045. The supporting text should be expanded to make the position on overall need, including why the assumed supply has fallen, and in turn the 'unmet need' much clearer. The level of unmet need, and that it is lower than 2011-2031, should be explained. The Plan should be unequivocal in terms of the quantum of unmet need and the period that applies to. Acknowledgment of provision previously made for Oxford's unmet need (e.g. in Salt Cross and West Eynsham) should also be referenced.	We do not think that it is appropriate in the emerging plan to compare the housing capacity to that in a previously withdrawn plan. We think that it does need to be clear how the capacity has been assessed, and we consider this is set out clearly in the SHLAA. We do agree that the context section above policy H1 could be used to set out the unmet need position and we propose modifications to include this information, with an additional 4th bullet point: Oxford's unmet housing need is therefore 12,519. The surrounding Oxfordshire districts have formally agreed to meet this need, with the following distribution: .
Policy H2- Delivering Affordable Homes Whilst we are largely supportive of the proposed approach to delivering affordable housing, including the priority being given to social rented tenures, we note the reference to the provision of 'genuinely affordable' housing and would simply observe that there is no such definition within the NPPF.	Comment noted. The City Council considers that affordability and housing costs in Oxford are such an issue that this approach is necessary in order to assure affordable housing needs are being met by the products provided as affordable.

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Oxford Health NHS Foundation Trust

Appendix 2: Detailed comments and responses

Summary of Comment in ICB's representation	Oxford City Council response	Final position
NEOAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. A new bullet point should be added to require the commissioning of a feasibility study looking at extension or reconfiguration of the existing practices in the area. A second bullet point should require a further feasibility study around the onsite delivery of healthcare provision. A turnkey facility is expected to be delivered by the developers for the ICB (or other relevant body). If the outcome of either feasibility study sets out that provision of a medical centre is not viable the offsite mitigation measures should be funded by developer contributions, to ensure the primary healthcare provision can support the new population growth.	There are six Primary Care Networks (PCN) serving Oxford, which cover 26 GP practices, and these practices are generally well distributed across the city. These PCNs are more relevant to healthcare than the infrastructure areas or indeed areas of focus in the Local Plan. In our research for the IDP we found that surgeries in this infrastructure area are accepting new patients. We are aware that there are capacity issues preventing expansion of some GP surgeries, but this does not seem to be universally the case. Whilst most infrastructure providers are able to indicate what infrastructure is required to support development, we realise this is harder for primary care. The Local Plan does not generally set out exactly how CIL receipts will be prioritised and spent. CIL will be collected, and there will be opportunities to spend it on a variety of infrastructure projects. This may well include primary healthcare projects if any have been identified. It is not considered appropriate therefore to specifically mention primary healthcare in relation to CIL in this Area of Focus. Similarly, no particular healthcare project has been identified for this area that S106 agreements could be required for. It would not be appropriate for the Local Plan to	ICB's objection remains.

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	set out a blanket requirement for S106 for primary healthcare within this Area of Focus, when firstly it is within a wider infrastructure area and indeed PCN, secondly there are surgeries accepting patients, thirdly there is no evidence that capacity can't be increased at existing sites (many seem to be on relatively large sites at low densities), fourthly, there is no identified infrastructure project these S106 agreements would be funding (including because the ICB has said that there is limited capacity at many GP surgeries for expansion, and has not identified any that could be expanded, so wording to ask for contributions towards an possible extensions or reconfigurations (specifically in this AOF) would not have a sound basis). It should be noted as well that the Area of Focus is not a development site itself, but an area in multiple ownerships, with multiple expected developments.	
CBLAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. Two bullet points should be added to say infrastructure needed includes a feasibility study looking at extension or reconfiguration of GP practices in the area and another bullet requiring provision of onsite healthcare	See response in relation to NEOAOF.	ICB's objection remains.

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provision bringing forward a 'turnkey' facility delivered by developers to the ICB. If the feasibility study sets out that the provision of a medical centre is not financially and/or operationally viable, other offsite mitigation measures should be provided funded by developer contributions.		
WEBRAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. One bullet points should be added to require commissioning of a feasibility study looking at extension or reconfiguration of GP practices in the area.	See response in relation to NEOAOF.	ICB's objection remains.
SPN1 Diamond Place and Ewert House The ICB welcomes the provision of an onsite medical centre. However, the policy does not provide any details of the medical centre provision, including the site area and whether parking will be provided to support the facility, although the ICB fully understands it is not feasible to have such details during the plan-making stage. Developers should be required to submit a feasibility study of provision, which primary healthcare service providers can be involved in commissioning, and which should include size of facility, project costing and delivery timescale. The	The policy is supportive of the potential for new medical facilities in this location, and the developer is supportive of this. However, it does not seem reasonable to expect the developer to be able to undertake feasibility work to find the best way for primary health care facilities to be delivered in this area. If a need to combine the facilities and a way of doing this is identified, then the policy allows these to come forward on this site, and the developer supports the positive wording the Plan. Details such as parking will be guided by other policies of the plan, although it should be noted that this site is in a district centre	ICB's objection remains.

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ICB expects that a 'turnkey' facility can be delivered for the ICB at nil cost and the facility would have similar contractual and rental arrangements to the existing premises. If the feasibility study shows the facility is not viable then other offsite mitigation should be required to ensure the primary healthcare provision can support the new population growth.	with public car parking available. However, the feasibility needs to be led by the body that oversees primary health care provision and understands how this fits together within the wider context of the city and beyond. Furthermore, it will need to be led by the body that understands mechanisms for these facilities both coming forward and being run, which is complex and likely to be depended on the interest and ability of GPs to take risks and bring this forward. Furthermore, it is not proportionate for the developer of this site to have the burden of the feasibility study, simply because their site has been identified as a potential opportunity site to enable the closure of two GP surgeries to be merged into one.	
SPS16 Templars Square There is an identified opportunity to merge the existing provision and to provide new medical premises at Templars Square. However, the policy does not provide any details of the medical centre provision, including the site area and whether parking will be provided to support the facility, although the ICB fully understands it is not feasible to have such details during the plan-making stage. Developers should be required to fund a feasibility study of provision, which primary healthcare service providers can be involved in commissioning, and which should include size of facility, project costing and delivery timescale. The ICB expects that a 'turnkey' facility can be delivered for the ICB	The policy is supportive of the potential for new medical facilities in this location, and the developer is supportive of this. However, it does not seem reasonable to expect the developer to be able to undertake feasibility work to find the best way for primary health care facilities to be delivered in this area. If a need to combine the facilities and a way of doing this is identified, then the policy allows these to come forward on this site, and the developer supports the positive wording in the policy. Details such as parking will be guided by other policies of the plan, although it should be noted that this site is in a district centre with public car parking available. However, the feasibility needs to be led by the body that oversees primary health care	ICB's objection remains.

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at nil cost and the facility would have similar contractual and rental arrangements to the existing premises. If the feasibility study shows the facility is not viable then other offsite mitigation should be required to ensure the primary healthcare provision can support the new population growth.	provision and understands how this fits together within the wider context of the city and beyond. Furthermore, it will need to be led by the body that understands mechanisms for these facilities both coming forward and being run, which is complex and likely to be depended on the interest and ability of GPs to take risks and bring this forward. Furthermore, it is not proportionate for the developer of this site to have the burden of the feasibility study, simply because their site has been identified as a potential opportunity site to enable the closure of two GP surgeries to be merged into one.	
Chapter 8 omission policy There is a missed opportunity to set out the provision of health infrastructure. The recently published NHS 10-year Health Plan is introducing neighbourhood health centres to provide a 'one stop shop. For patients. There is a need to include this in the draft Local Plan as this will be a major infrastructure as set out in the NPPF, and the NPPF emphasises that local plans should set out the contributions expected from development. Clearly, the current draft OLP2045 does not provide any details as required by the NPPF about the contributions expected from development towards health. There should be a draft policy on Health Infrastructure in Chapter 8, that says (amongst other things) that development proposals will be supported if they comprise a new GP facility funded by developer	Policy S3 in Chapter 1 relates to 'Infrastructure Delivery in New Development' This policy refers to the Infrastructure Delivery Plan, say that that is where projects required to support the Local Plan strategy are identified. The IDP can be reviewed and updated more frequently and easily than a Local Plan and is therefore more responsive to changing needs. Policy S3 also says that developers will be expected to engage early with the City Council and infrastructure service providers to discuss their requirements. It is wholly unrealistic that a policy could be included that says development proposals should include a new GP facility/neighbourhood health centre unless a feasibility study is carried out that shows onsite provision is not viable or the scale of proposals to do not merit an onsite facility.	ICB's objection remains.

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contributions or CIL and that development proposals that are not providing a neighbourhood health centre will only be supported if the onsite provision is not viable or the scale of the proposals do not merit an onsite facility.	Presumably this would apply to residential accommodation only, although that is not clear in the rep. Nearly all development that comes forward in Oxford is small, and too small to generate the need for additional health facilities by itself, or even any discernible need for any improvements. This is especially the case when nearly all facilities in Oxford are accepting new patients. Once the likely implications of a change in how primary health care is delivered is worked through an applied to Oxford, then the IDP can be updated to reflect this, but at the current time there is no certainty about what this means that can be reflected in the IDP (or Local Plan itself).	

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ICB (NHS Thames Valley)

Summary of Comment in Cherwell District Council's representation	Oxford City Council response
NEOAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. A new bullet point should be added to require commissioning of a feasibility study looking at extension or reconfiguration of Cutteslowe Surgery and Wolvercote Surgery in the area. A second bullet point should require a feasibility study for onsite delivery of healthcare provision. A turnkey facility is expected to be delivery by developers to the ICB (or other relevant body). If the outcome of the feasibility study sets out that provision of a medical centre is not viable the other offsite mitigation measures should be provided funded by developer contributions, to ensure the primary healthcare provision can support the new population growth.	There are six Primary Care Networks (PCN) serving Oxford, which cover 26 GP practices, and these practices are generally well distributed across the city. These PCNs are more relevant to healthcare than the infrastructure areas or indeed areas of focus in the Local Plan. In our research for the IDP we found that surgeries in this infrastructure area are accepting new patients. We are aware that there are capacity issues preventing expansion of some GP surgeries, but this does not seem to be universally the case. Whilst most infrastructure providers are able to indicate what infrastructure is required to support development, we realise this is harder for primary care. The Local Plan does not generally set out exactly how CIL receipts will be prioritised and spent. CIL will be collected, and there will be opportunities to spend it on a variety of infrastructure projects. This may well include primary healthcare projects if any have been identified. It is not considered appropriate therefore to specifically mention primary healthcare in relation to CIL in this Area of Focus. Similarly, no particular healthcare project has been identified for this area that S106 agreements could be required for. It would not be appropriate for the Local Plan to set out a blanket requirement for S106 for primary healthcare within this Area of Focus, when firstly it is within a wider infrastructure area and indeed PCN, secondly there are surgeries accepting patients, thirdly there is no evidence that capacity can't be increased at existing sites (many seem to be on relatively large sites at low densities), fourthly, there is no identified infrastructure project these S106 agreements would be funding (including because the ICB has said that there is

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	limited capacity at many GP surgeries for expansion, and has not identified any that could be expanded, so wording to ask for contributions towards an possible extensions or reconfigurations (specifically in this AOF) would not have a sound basis). It should be noted as well that the Area of Focus is not a development site itself, but an area in multiple ownerships, with multiple expected developments.
CBLAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. Two bullet points should be added to say infrastructure needed includes a feasibility study looking at extension or reconfiguration of GP practices in the area and another bullet requiring provision of onsite healthcare provision bringing forward a 'turnkey' facility delivered by developers to the ICB. If the feasibility study sets out that the provision of a medical centre is not financially and/or operationally viable, other offsite mitigation measures should be provided funded by developer contributions.	See response in relation to NEOAOF.
WEBRAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. One bullet points should be added to require commissioning of a feasibility study looking at extension or reconfiguration of GP practices in the area.	See response in relation to NEOAOF.

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SPN1 Diamond Place and Ewert House The ICB welcomes the provision of an onsite medical centre. However, the policy does not provide any details of the medical centre provision, including the site area and whether parking will be provided to support the facility, although the ICB fully understands it is not feasible to have such details during the plan-making stage. Developers should be required to submit a feasibility study of provision, which primary healthcare service providers can be involved in commissioning, and which should include size of facility, project costing and delivery timescale. The ICB expects that a 'turnkey' facility can be delivered for the ICB at nil cost and the facility would have similar contractual and rental arrangements to the existing premises. If the feasibility study shows the facility is not viable then other offsite mitigation should be required to ensure the primary healthcare provision can support the new population growth.	The policy is supportive of the potential for new medical facilities in this location, and the developer is supportive of this. However, it does not seem reasonable to expect the developer to be able to undertake feasibility work to find the best way for primary health care facilities to be delivered in this area. If a need to combine the facilities and a way of doing this is identified, then the policy allows these to come forward on this site, and the developer supports the positive wording the Plan. Details such as parking will be guided by other policies of the plan, although it should be noted that this site is in a district centre with public car parking available. However, the feasibility needs to be led by the body that oversees primary health care provision and understands how this fits together within the wider context of the city and beyond. Furthermore, it will need to be led by the body that understands mechanisms for these facilities both coming forward and being run, which is complex and likely to be depended on the interest and ability of GPs to take risks and bring this forward. Furthermore, it is not proportionate for the developer of this site to have the burden of the feasibility study, simply because their site has been identified as a potential opportunity site to enable the closure of two GP surgeries to be merged into one.
SPS16 Templars Square There is an identified opportunity to merge the existing Donnington Medical Centre and Temple Cowley Health Centre and to provide new medical premises at Templars Square. However, the policy does not provide any details of the medical centre provision, including the site area and whether	The policy is supportive of the potential for new medical facilities in this location, and the developer is supportive of this. However, it does not seem reasonable to expect the developer to be able to undertake feasibility work to find the best way for primary health care facilities to be delivered in this area. If a need to combine the facilities and a way of doing this is identified, then the policy allows

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parking will be provided to support the facility, although the ICB fully understands it is not feasible to have such details during the plan-making stage. Developers should be required to submit a feasibility study of provision, which primary healthcare service providers can be involved in commissioning, and which should include size of facility, project costing and delivery timescale. The ICB expects that a 'turnkey' facility can be delivered for the ICB at nil cost and the facility would have similar contractual and rental arrangements to the existing premises. If the feasibility study shows the facility is not viable then other offsite mitigation should be required to ensure the primary healthcare provision can support the new population growth.	these to come forward on this site, and the developer supports the positive wording in the policy. Details such as parking will be guided by other policies of the plan, although it should be noted that this site is in a district centre with public car parking available. However, the feasibility needs to be led by the body that oversees primary health care provision and understands how this fits together within the wider context of the city and beyond. Furthermore, it will need to be led by the body that understands mechanisms for these facilities both coming forward and being run, which is complex and likely to be depended on the interest and ability of GPs to take risks and bring this forward. Furthermore, it is not proportionate for the developer of this site to have the burden of the feasibility study, simply because their site has been identified as a potential opportunity site to enable the closure of two GP surgeries to be merged into one.
Chapter 8 omission policy There is a missed opportunity to set out the provision of health infrastructure. The recently published NHS 10-year Health Plan is introducing neighbourhood health centres to provide a 'one stop shop. For patients. There is a need to include this in the draft Local Plan as this will be a major infrastructure as set out in the NPPF, and the NPPF emphasises that local plans should set out the contributions expected from development. Clearly, the current draft OLP2045 does not provide any details as required by the NPPF about the contributions expected from development towards health. There should be a draft policy on Health Infrastructure in Chapter 8, that says (amongst other things) that development proposals will be supported if they comprise a new GP facility funded by developer contributions or CIL and that development proposals	Policy S3 in Chapter 1 relates to 'Infrastructure Delivery in New Development' This policy refers to the Infrastructure Delivery Plan, say that that is where projects required to support the Local Plan strategy are identified. The IDP can be reviewed and updated more frequently and easily than a Local Plan and is therefore more responsive to changing needs. Policy S3 also says that developers will be expected to engage early with the City Council and infrastructure service providers to discuss their requirements. It is wholly unrealistic that a policy could be included that says development proposals should include a new GP facility/neighbourhood health centre unless a feasibility study is carried out that shows onsite provision is not viable or the scale of proposals to do not merit an onsite facility. Presumably this would

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that are not providing a neighbourhood health centre will only be supported if the onsite provision is not viable or the scale of the proposals do not merit an onsite facility.	apply to residential accommodation only, although that is not clear in the rep. Nearly all development that comes forward in Oxford is small, and too small to generate the need for additional health facilities by itself, or even any discernible need for any improvements. This is especially the case when nearly all facilities in Oxford are accepting new patients. Once the likely implications of a change in how primary health care is delivered is worked through an applied to Oxford, then the IDP can be updated to reflect this, but at the current time there is no certainty about what this means that can be reflected in the IDP (or Local Plan itself).

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Lincoln College

Policy/section	Summary of Lincoln College Reg 19 comment	Lincoln College Reg 19 suggested change	Oxford City Council response/proposed modification	Type of modification or action
Policy H1: Housing Requirement	Policy is considered sound - support efforts to maximize the deliverability and capacity of suitable housing sites in the City.	N/A	Support is noted, no further action proposed.	None
Policy H3: Affordable Housing from other development types	Policy is considered to be unsound as not justified (criterion b). Lincoln College do not agree that affordable housing contributions should be required from the redevelopment of existing university sports pitches.	Amend the wording of Policy H3/ the Glossary to include sports pitches within the definition of an "existing or proposed university or college campus site".	In order to be considered a university or college campus some form of academic uses would also need to be present on the site. These uses are set out in the Glossary. An isolated sports pitch would not meet the requirements to demonstrate wider academic use and therefore cannot be considered to meet the criteria set out in Policy H3. As such, the proposed amendment will not be taken forward.	None
Policy H8: Location of new Student Accommodation	Policy is considered sound. Additionally, Lincoln College comments that it is essential that the Local Plan	N/A	Support is noted, no further action proposed.	None

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Policy/section	Summary of Lincoln College Reg 19 comment	Lincoln College Reg 19 suggested change	Oxford City Council response/proposed modification	Type of modification or action
	2045 fully recognises, supports and builds upon the vitally important economic and educational role of the Colleges, Universities and other educational institutions in the City, whilst managing the requirements of students in Oxford along with the considerable needs of other groups in the City for general market and affordable housing.			
Policy SPE7: Lincoln College Sports Ground	Policy is considered to be unsound as not justified (criterion b). In order to ensure that suitable access can be provided to the site, and to respond to the surrounding heritage and urban design constraints, an	Extend the red line site area to include the land running along Barracks Lane edge to the corner with Bartlemas Close.	Extend the red line site area to include the land running along Barracks Lane edge to the corner with Bartlemas Close as per the drawing attached at Appendix B.	Main

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Policy/section	Summary of Lincoln College Reg 19 comment	Lincoln College Reg 19 suggested change	Oxford City Council response/proposed modification	Type of modification or action
	amendment to the red line site area plan would be required.			
	Policy is considered to be unsound as not justified (criterion b). In order to ensure that suitable access can be provided to the site, and to respond to the surrounding heritage and urban design constraints, an amendment to the red line site area plan would be required.	Extend the red line site area to include the land running along Barracks Lane edge to the corner with Bartlemas Close.	Add the following wording (underlined) to the site allocation policy SPE7 under paragraph e) to provide clarity about the sensitivities along the extended site boundary on Bartlemas Close: The Crescent Road View Cone crosses the south of the site; proposals should be designed in a way that responds to this protected view (Policy HD6). This could be achieved by creating a graduation of height, lower on the southern edge and increasing in height towards the north, as well as appropriate massing and considering variations in roof forms. Development proposals located on the eastern corner of the site between Bartlemas Close and Barracks Lane should be designed in a way that integrates sensitively with the existing street scene, landscape character and neighbouring residential context, whilst	Minor

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Policy/section	Summary of Lincoln College Reg 19 comment	Lincoln College Reg 19 suggested change	Oxford City Council response/proposed modification	Type of modification or action
			respecting the character, appearance and significance of the Conservation Area. Gaps between buildings should be sufficient to retain the sense of openness and views of the green backdrop which enhance the setting of the Conservation Area (Policy HD3).	

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Network Rail

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
Policy S1: Spatial Strategy	Support for Spatial Strategy Network Rail supports the Local Plan Spatial Strategy, notably the reference that seeks to locate development in areas well served and close to public transport, including rail. Detailed comments re: Criterion f) Amed criterion f) as follows: *f) Ensure new uses are in locations where they will not harm the amenity **or operation** of existing neighbouring uses.* This will help to ensure that development, including residential uses, close to the railway does not restrict existing or likely future operational rail requirements in line with the 'agent of change' principle established in Paragraph 200 of the NPPF.	Support for Spatial Strategy Support noted Detailed comments re: Criterion f) Paragraph 200 of the NPPF establishes the 'Agent of Change; principle. While Policy R8 - Amenity Impacts of Development and its supporting text does embody the Agent of Change principle within the plan itself, we do acknowledge that bullet point f) of the Spatial Strategy could also refer to the continued operation of existing neighbouring uses as well as their amenity. As such, a modification is proposed to criterion f) of Policy S1.	Support for Spatial strategy No change proposed Detailed comments re: Criterion f) Insert the following words into criterion f) *f) Ensure new uses are in locations where they will not harm the amenity or continued operation of existing neighbouring uses;*
Policy S3: Infrastructure Delivery in New Development	Support for Policy S3 We welcome the Plan's recognition of the critical role of rail in supporting sustainable growth, particularly through the safeguarding of land for East West Rail, improvements to	Support for Policy S3 Support Noted	Support for Policy S3 No change proposed

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	Oxford Station, and the reopening of the Cowley Branch Line (Policy S3). Network Rail supports the intent of Policy S3 which outlines how the Council will work with infrastructure providers to support the delivery of infrastructure. <u>Rail infrastructure narrative within the Plan</u> A key concern is that the rail infrastructure narrative as set out within the Oxford Local Plan 2045 appears to stop at the completion of currently defined schemes (notably East West Rail Phase 2 and Cowley Plus), despite the Plan itself clearly anticipating continued population, employment and visitor growth beyond these interventions. The supporting text refers to longer-term growth pressures and endorses initiatives such as OxRail 2040, yet the implications of this ambition for rail infrastructure within Oxford are not fully articulated. While it is understood that this Local Plan is not the appropriate document for detailed station masterplans or full route alignments, there is a notable absence of acknowledgement that further rail capacity enhancements within	<u>Rail infrastructure narrative within the Plan</u> The (introductory) supporting text to the West End and Botley Road Area of Focus section of Chapter 8 (page 246, CSD001), highlights that the "transformation of Oxford Station is fundamental, not just to improve user experience, but to facilitate additional capacity to help deliver East West Rail and the re-opening of the Cowley Branch Line to passenger services". Policy WEBRAOF bullet point k) in the infrastructure section of the policy includes a direct reference to OxRail 2040: Plan for Rail (see page 248, CSD001) While the Local Plan 2045 captures the most important rail infrastructure projects, the Infrastructure Delivery Plan (IDP) includes a range of infrastructure projects that have been identified by stakeholders	<u>Rail infrastructure narrative within the Plan</u> No change proposed <u>Supporting growth beyond the mid-2030s</u> No change proposed <u>Future enhancements</u> No change proposed

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	Oxford will be required beyond currently committed schemes. Given repeated engagement with both City and County Councils on the constraints of the existing rail corridor and station capacity, this omission risks creating a strategic disconnect between growth aspirations and infrastructure realism. We consider it important that the Plan explicitly recognises that: <u>Supporting growth beyond the mid-2030s</u> • Supporting growth beyond the mid-2030s will require additional rail infrastructure interventions within Oxford itself, not solely at its periphery.	as being required to support the plan's delivery. The IDP represents a snapshot in time and is updated throughout the plan-making process. This is to ensure that it captures the most up-to-date infrastructure projects. If Network Rail considers there are any specific infrastructure projects that should be included and are not, these can be added to the delivery schedule when the IDP is next updated. <u>Supporting growth beyond mid-2030s</u> The County Council's adopted Rail Plan - OxRail 2040 supports wider rail-related growth in the county. Oxford's Local Plan 2045 makes appropriate references to OxRail 2040. There is no need to duplicate its contents. The City and County have worked and continue to work closely on rail-related plans. In the specific example, city and county colleagues worked closely to ensure an appropriate level of coverage commensurate to each respective document was contained within it. Discussions have been on-going since 2021 about re: the Oxford Station redevelopment and the	

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	Future enhancements • Future enhancements may necessitate changes to existing rail alignments, junctions, station layouts and operational land, some of which could have implications for land use, heritage assets and environmental designations. These requirements should be acknowledged now to avoid future conflicts with policies that otherwise seek to constrain development in sensitive locations.	city's Infrastructure Delivery Plan (IDP) appropriately references known publicly available delivery timescales. Future enhancements Where future enhancements require planning permission, these will need to be assessed against, the Policies in the Plan as a whole. Finally, it is worth noting that (introductory) supporting text for the West End and Botley Road Area of Focus highlights that "there is likely to be a degree of tension in delivering development that protects and enhances Oxford's iconic dreaming spires and the ambitions of delivering certain development types".	
Policy WEBRA OF: West End and Botley Road Area of Focus	Network Rail supports the identification of the West End and Botley Road as an 'Area of Focus'. However, we note that the Draft Local Plan no longer refers to the Area's "significant opportunity to create high density urban living with good provision and access to open space and a vibrant mix of uses, and also to make a significant contribution to the knowledge economy."	The plan does refer to these aspects however, they are now set out as "key considerations for infrastructure and design across the wider Central and West Infrastructure Area, which contains two Areas of Focus – the University Areas North of the City Centre Area of Focus; and the West End and Botley Road Area of Focus.	No change proposed

	These qualities were previously set out as key reasons for designating this area as an Area of Focus, and we consider it important that future policy continues to acknowledge this potential and actively support the area in realising it.	These exact phrases are now found in the (introductory) supporting text to the *Central and West Infrastructure Area* section of Chapter 8 of the Plan. (See page 242 of CSD001).	
Policy I2: Safeguarding Land for Infrastructure	<u>General comment</u> Policy I2 aims to safeguard the land required to deliver the specific strategic infrastructure schemes in the Plan to support their delivery. Notably, land has been safeguarded to deliver the East West Rail (Oxford) railway link. The East West Rail Safeguarding Directions (November 2025) confers specific requirements in relation to development proposals involving the land safeguarded for East West Rail (Oxford). <u>Latest operational requirements</u> Whilst the safeguarding of land is supported by Network Rail, the safeguarded boundary shown may not reflect the latest operational and construction requirements, particularly given that East West Rail's safeguarding limits continue to evolve as the project progresses. <u>Re: construction compounds, etc.</u>	<u>General comment</u> General comment noted <u>Latest operational requirements</u> We have had separate discussions with EWR. We can update to inform the progression of EWR as the plan progresses. Any changes to the land contained within the EWR Project that take place while the Oxford Local Plan 2045 is being progressed can be updated. Policy I2 already sets out the following (**bold text** highlights future proofing within policy itself) *Planning permission involving land safeguarded for East West Rail (Oxford) will not be granted until the East West Rail Company has been consulted and the procedure set out in the East West Rail Safeguarding Directions* ***(or the***	<u>General comment</u> No change proposed <u>Latest operational requirements</u> No change proposed <u>Re: construction compounds, etc.</u> No change proposed

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	The current safeguarding boundary may not fully account for temporary and permanent construction compounds, access arrangements, and ancillary infrastructure, and this is something that will need to be considered.	***requirements of any future equivalent or consenting legislation)*** *has been followed.* <u>Re: construction compounds, etc.</u> We have consulted with EWR and they are content with the extent of the safeguarding.	
Policy I2 – Safeguarding Land for Infrastructure	There appears to be a potential land use conflict in the Oxford Parkway area, specifically involving agricultural land between the A34 and Oxford Parkway Station (postcode OX2 8JQ). The land is identified within the Plan as having development potential and is also understood to be of interest or potential importance to East West Rail for operational or construction-related purposes. Without clearer policy alignment, there is a risk that development proposals could come forward that compromise rail infrastructure delivery, or that safeguarding requirements could undermine allocated development sites. This issue would benefit from clearer cross-referencing between site allocation policies and rail safeguarding policies to ensure consistency and certainty.	We have discussed the potential implications of site allocations within Oxford's administrative boundary which included land that is included within the provisions of the EWR Safeguarding Direction November 2025. In the area described in the representation from Network Rail, the nearest site allocation within Oxford city is SPN5 Pear Tree Farm. Where development sites that are allocated in Oxford city are impacted by the Safeguarding Direction, text has been included both with Policy I2 and the relevant site allocation policy. It is worth noting that the Safeguarding Direction applies irrespective of whether there is a local development plan policy in place.	No change proposed

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		It is also worth noting that policies contained within Oxford's Local Plan only apply within the city's administrative boundary.	
Policy WEBRA OF: West End and Botley Road Area of Focus	<u>Support for OxRail2040</u> The Plan's support for OxRail2040 is welcomed. <u>General comment</u> However, there is a possible conflict between the aspiration for OxRail2040 and some of the protections within the document. <u>Scale of service enhancement (OxRail 2040)</u> Delivering the scale of service enhancement associated with OxRail 2040 is likely to require increased railway land take in certain locations, potentially including areas currently within floodplain or protected environmental designations, as well as possible construction within Oxford's protected view cones including views of the historic skyline. While the protection of Oxford's landscape and heritage is fully recognised and supported, it is important that risk to future rail schemes necessary to deliver the Plan's growth and sustainability objectives are not conflicting with policy.	<u>Support for OxRail2040</u> Support noted <u>General comment</u> General comment noted. <u>Scale of service enhancement (OxRail 2040)</u> OxRail 2040 recognises that the 'transformation' of Oxford Rail Station is a longer-term ambition (circa. 2037). Given the heritage significance of the location of the railway station, design considerations will be key to delivering a successful scheme See response to Policy S3 for more details however it is important to re-iterate that where development proposals require planning permission, these will need to be assessed against, the Policies in the Plan as a whole.	<u>Support for OxRail2040</u> No change proposed <u>General comment</u> No change proposed <u>Scale of service enhancement (OxRail 2040)</u> No change proposed

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Omission Policy:	<u>Rail Freight</u> We strongly support a policy approach that protects existing rail freight facilities, infrastructure and operational capability within Oxford and its immediate areas. While the Plan safeguards land for East West Rail and other strategic infrastructure, it does not explicitly protect existing rail-served sites, sidings or rail freight access arrangements from being compromised by adjacent development. We recommend that the Plan acknowledges safeguarding of existing rail freight facilities and rail-served sites to ensure development does not prejudice their continued and future use.	<u>Rail Freight</u> Policy I2 specifically highlights infrastructure schemes which are delivered through consenting regimes that lie outside the Local Plan's jurisdiction. The purpose of the policy is not to safeguard existing facilities but rather to acknowledge that the two named infrastructure schemes (i.e., OFAS/ EWR Project) are coming forward in parallel with the Oxford Local Plan 2045. Any development proposals that are within 10m of existing railway infrastructure must consult NR and are advertised in a different way to standard planning applications. We consider these existing requirements to be sufficient.	<u>Rail Freight</u> No change proposed
Policy SPCW9: Oxford Railway Station and Becket St Car Park	Network Rail are supportive of the works to Oxford Railway Station and proposed mixed use development for Becket Street Car Park with a number of residential, retail and commercial uses proposed. However, we believe the policy should also incorporate the need for education facilities and this should be reflected in the policy wording. Proposed	We do not accept the proposed inclusion of "education facilities" within the suite of named primary uses which are supported within this policy. Following a meeting with Network Rail and the City Council on 30 March 2026, Network Rail clarified that there may be an opportunity to bring forward some Use	No change proposed

	Modifications to the first paragraph of Policy SPCW9 are set out below: *Planning permission will be granted for a new station and associated public realm alongside a mix of uses including residential and/ or student accommodation, employment* ***and education uses*** *(Use Class E), and complementary town centre uses including retail, cafés and evening economy uses, which activate ground floor frontages and help to create a vibrant city quarter.*	Class E(f) uses (e.g., day nursery), as complementary uses at the site. The City Council considers that the policy, as drafted, already enables complementary uses to come forward at the site. The final sentence in the third paragraph of the policy states: *"Other complementary uses will be assessed on their merits".* As such, there is no need to make a specific reference to Use Class E(f) uses within this policy.	
Policy SPCW2: Botley Road Sites around Cripley Road including River Hotel and Westgate Hotel	With the potential inclusion of the western side of the station and the proposed allocations set out in SPCW2, consideration should be made for the subsequent impact of the proposals on one another. The proposal for residential development should consider compatibility with the aspirations of the station's redevelopment.	The City Council acknowledges that this site is in close proximity to the railway and other potential noise sources. Given the site's location nearby to sources of noise, Policy R8 would apply. Where other sites are located near a potential noise source, this information is highlighted in other site allocation policies. Therefore, to ensure a consistent approach, a minor modification has been proposed (see "change proposed" column for details).	Create an additional heading in bold font under bullet point k) and then create an additional bullet point which states: ***Additional requirements*** *l) Due to the potential impacts of noise from a number of sources (including the railway), development proposals should be informed by an acoustic design statement that addresses the*

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			*potential for significant environmental noise (**Policy R8**).*
Policy SPCW7: Nuffield Sites	The parcel of land adjacent to Beckett Street which is identified within Policy SPCW7 lies opposite the station redevelopment allocation and can easily be impacted by the forthcoming proposals subject to what is proposed within the Nuffield site. Consideration within this policy should be made against the station redevelopment proposals. The allocation allows a mix of uses across the three sites that delivers residential and/or student accommodation, employment uses, and appropriate other uses including retail, cafés/restaurants and other uses that support the evening economy. A minimum number of 59 dwellings (net gain) (or if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). These could conflict with the Becket Street proposals on an amenity harm basis.	The City Council acknowledges that part of the site (Land South of Frideswide Square) is in close proximity to the railway and other potential noise sources. Given the site's location nearby to sources of noise, Policy R8 would apply. Where other sites are located near a potential noise source, this information is highlighted in other site allocation policies. Therefore, to ensure a consistent approach, a minor modification has been proposed (see "change proposed" column for details).	Create a new bullet point under the "additional requirements" heading which states: *r) Due to the potential impacts of noise from a number of sources (including the railway), development proposals should be informed by an acoustic design statement that addresses the potential for significant environmental noise (**Policy R8**).*
Policy CBLAOF: Cowley Branch Line Area of Focus	Network Rail welcomes the inclusion of the Cowley Branch proposal and policy to maximise development value in and around the two proposed stations.	Support noted.	No change proposed

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	Network Rail supports the approach set out in this policy in favour of sustainable travel modes. NR notes that any offsite works will need to be promoted and delivered by the Local Authority. In order the proposed stations (as referenced in the policy) to be delivered, NR set out that Mallams footpath level crossing must be formally closed. It currently forms part of the PROW network, and the nearby Spring Lane Level Crossing requires upgrades as an alternative to Mallams (as part of the Cowley Branch project). The closure of these level crossings is acknowledged within the plan document which is supported by Network Rail.		

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