



The Planning
Inspectorate

Report to Oxford City Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO SITES AND HOUSING

LOCAL PLAN

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Abbreviations Used in this Report

AA	Appropriate Assessment
AAP	Barton Area Action Plan Local Plan
AHVS	Affordable Housing Viability Study
AMR	Annual Monitoring Report
BCIS	Building Cost Information Service
CBRE Study	CBRE Affordable Housing Viability Study - Student Accommodation
CS	Core Strategy
CIL	Community Infrastructure Levy Charging Schedule
EIA	Equalities Impact Assessment
HMO	Houses in Multiple Occupation
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
LIP	Local Investment Plan for Oxfordshire
LP	Oxford Local Plan 2001-2016
LTP	Local Transport Plan 3
MM	Main Modification
OHMA	Oxfordshire Housing Market Assessment
The Plan	Sites and Housing Plan
RS	Regional Strategy: South East Plan
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SPD	Supplementary Planning Document
SPIP	Spatial Planning and Infrastructure Partnership
SODC	South Oxfordshire District Council
SSSI	Site of Special Scientific Interest

Non-Technical Summary

This report concludes that the Sites and Housing Local Plan provides an appropriate basis for the planning of the City over the next 13 years providing a number of modifications are made to the Plan. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the Plan. All of the modifications to address this were proposed by the LPA, and I have recommended their inclusion after full consideration of the representations from other parties on these issues.

The modifications can be summarised as follows:

- For compliance with the Framework, the addition of policy MP1 to emphasise the Plan's presumption in favour of sustainable development and clarification of the contribution made to heritage assets by their settings;
- Clarification of the approach towards provision of accommodation for Travelling Communities;
- Amendment of policy HP2 by adding reference to viability considerations;
- Amendment of policy HP4 to permit on-site provision of affordable housing where this is appropriate;
- Clarification of the definitions of 'campus', 'student accommodation' and 'graduate accommodation';
- Addition of further exceptions to policy HP6;
- Addition of flexibility of policy HP7 to take account of site-by-site considerations;
- Amendments to policy HP8 for effectiveness;
- Amendment to policy HP9 to appropriately reflect the exceptional quality of Oxford's historic environment;
- Addition of flexibility to policy HP11 to take account of viability considerations;
- Amendment of the car-parking standards for consistency with County-wide standards;
- Amendment of various policies to promote reduction of reliance on the private car;
- Deletion of site SP31 because its development is almost complete;
- Combination of sites SP39 and SP46 for effectiveness;
- Updating of the Housing Trajectory;
- Addition of the requirement to consider the implications of development on the historic environment in relevant policies;
- Clarification of the mitigation requirements regarding the natural environment in relevant policies;
- Amendment to policy SP9 to correctly reflect the Sequential Test process;
- Addition of viability considerations in policies SP14, SP52 and SP59;
- Amendment to the wording of various policies for justification;
- Amendment to the wording of various policies for effectiveness; and
- Clarification of water supply considerations in relevant policies.

Introduction

1. This report contains my assessment of the Sites and Housing Local Plan (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) (the Framework) makes clear that to be sound a local plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft plan May 2012, together with the Council's proposed minor post-publication changes detailed in core document [3.4]. However, the consultation period for the Plan finished immediately prior to the publication of the Framework and Planning Policy for Traveller Sites. Thus, a further round of consultation took place inviting comments on their implications for the soundness of the Plan, including on meeting the additional soundness requirement that the Plan has been positively prepared. I have taken all responses into account.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant. They are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix to the report.
4. The main modifications that go to soundness have been subject to public consultation and, where necessary, Sustainability Appraisal (SA) and I have taken the consultation responses into account.

Assessment of Duty to Co-operate

5. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
6. It is clear from the Council's Soundness Self Assessment Paper [3.42], which lists relevant joint partnership arrangements on a range of issues including; housing and infrastructure provision, transport and car parking standards, meetings and correspondence, that it has sought to engage constructively with all of the bodies prescribed in s110 of the Localism Act 2011 at appropriate stages in the Plan making process, as well as many other partner organisations.
7. The Council is a member of the Oxfordshire Spatial Planning and Infrastructure Partnership (SPIP) that was set up to guide the development of the Local Investment Plan for Oxfordshire (LIP) [6.11]. The LIP outlines and integrates the long term housing, economic and infrastructure plans of the Oxfordshire partner Councils, the Oxfordshire Primary Care Trust (NHS Oxfordshire), the Highways Agency, Network Rail and the Environment Agency.

8. Due to its own pressing housing need and Oxford's tightly drawn boundaries it is agreed by the partners that the City should not seek to meet housing from within neighbouring areas. However, the Plan demonstrates that the Council can meet its target of providing 8,000 homes within its own boundary without reliance on neighbouring districts. The LIP sets out an agreed way forward for the delivery of strategic infrastructure on a County-wide basis. The individual and cumulative impacts of the Plan's site allocations have been discussed with key bodies including the Environment Agency, Natural England, utility providers and the local transport authority to ensure that the policies of the Plan require appropriate mitigation measures. The City and County Councils have engaged closely on transport related issues and with integrating development on allocated sites with the Local Transport Plan 3 [6.12] (LTP). From statements of common ground with these key bodies it is clear that they have no outstanding concerns regarding the soundness of the Plan.
9. In preparing its Community Infrastructure Levy (CIL) charging schedule the Council is working closely with the County Council. In addition, the Council's leader sits on the board of the Oxfordshire Local Enterprise Partnership (LEP), which is a voluntary body of representatives from business, academia and the wider public sector that aims to be a catalyst for realising Oxfordshire's economic and commercial potential.
10. I conclude that the Duty to Co-operate has been met.

Assessment of Soundness

Preamble

11. The City-wide planning policies that establish the overall framework for the Plan are set out in the saved policies of the Oxford Local Plan 2001-2016 (LP) [5.5] and in the Core Strategy (CS), adopted in 2011 [5.1]. Consistent with the CS, the Plan aims to positively promote and drive forward a policy framework to encourage the delivery of more homes, and especially affordable homes, in a timely way. Appendix 1 of the Plan lists the policies of the LP that it supersedes and the necessary consequential changes to the Policies Map, which are detailed in [3.15].
12. The first part of the Plan contains housing policies which provide detail on the requirements for affordable housing delivery and other forms of housing to meet the needs of special groups. The policies reflect the balance sought between delivering more general purpose housing and more student accommodation, and the circumstances under which change of use to houses in multiple occupation (HMO) will be acceptable. The housing policies also aim to ensure that new housing development is designed to a high standard with minimal adverse impact on the built environment and natural resources. The policies seek to ensure that an appropriate mix of housing tenures, types and sizes are provided to meet existing needs and future population growth. The second part of the Plan contains policies which allocate sites for specific types of housing and other development.
13. The Localism Act provides the mechanism for the revocation of regional strategies, but at the time of writing this report the Regional Strategy: South East Plan (RS) [6.2] remains part of the City's development plan. Nevertheless, the implications of the intended revocation of the RS on housing provision in Oxford were discussed at a full Council meeting held in September

2010 and were explored during the examination of the CS. It was concluded that the overall housing target for Oxford set in the RS is appropriate. This is reflected in CS policy CS22. The target has not been contested nor has any evidence been presented to the examination of this Plan that leads me to a different conclusion.

Main Issues

14. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified seven main issues upon which the soundness of the Plan depends.

Issue 1 – An Overview of the Soundness of the Plan

Whether the Plan has been positively prepared, is justified by proportionate evidence, is appropriate when considered against feasible alternatives, is effective and has an adequate monitoring strategy, and is consistent with the CS and national planning policy.

15. Although the Plan was prepared prior to the new soundness requirement of the Framework, it is clear from the Council's Soundness Self Assessment [3.42] that it has been positively prepared and is based on co-operation with neighbouring authorities and public, voluntary and private sector organisations. Also, that it reflects the 'golden thread' of sustainable development and includes policies that guide how the presumption should be applied locally. However, to make this explicit for soundness, **(MM1)** is necessary. This main modification would insert supporting text and new policy MP1, which closely reflects the model policy within the context of Oxford.
16. The policies and allocations of the Plan are justified by a comprehensive, generally up-to-date and proportionate evidence base, including a suite of Background Papers that helpfully summarise information from a variety of sources on a topic basis. Where necessary, discrete parts of the evidence base have been updated and supplemented during the examination period. Representors have had the opportunity to comment on all new evidence.
17. The evolution of the Plan is clearly based upon the testing of feasible options in order to find the most appropriate policy solutions and site allocations, as detailed in the Background Papers, and the respective SAs for the housing policies [3.10] and the sites allocations [3.9].
18. The housing policies were developed to follow the approaches set out in the CS and to take account of the key policy areas identified at the Pre-Options consultation stage [3.8] and [3.13]. At the Preferred Options stage [3.5] a preferred option was identified for each policy area based on an assessment of how well the options would meet the CS and Plan's Objectives. This stage involved further work on viability and SA. Background Papers 7-15 summarise this process and the key evidence that fed into the options [3.23-3.31]. At the Proposed Submission stage the Preferred Option was generally taken forward, taking account of public views.
19. The process for identifying and filtering sites, considering the options and the most appropriate uses for the sites followed a logical, transparent and robust process which was clearly informed by the CS, SA, and public and stakeholder

- consultation. Background Paper 1: Creating the Initial Database of Sites [3.17] explains the process used to ensure that all potential sites were assessed. The first stage of the sites assessment considered sites from a range of sources including LP allocations and designations, the canvassing of landowners, developers and planning agents in a call for sites, the Strategic Housing Land Availability Assessment (SHLAA) [6.5], map searches and information from other Council services.
20. These sources resulted in the identification of 191 initial sites that underwent a sifting process ahead of the Pre-Options consultation stage [3.13] to take account of a variety of constraints including existing policy designations, planning status, flood risk, impact on green and other infrastructure, size and site characteristics and the likelihood of delivery. As a result, 86 sites were retained. Following consultation on the Preferred Options [3.5], the Proposed Submission document was produced. For most sites, the Preferred Option was carried forward. Where it was not, detailed justification for its rejection is provided in the SA [3.9]. In addition, Background Paper 16: Site Audit Trail [3.32] provides a clear audit trail of every site considered and its path through the site selection process.
 21. The scoping of the objectives for the housing policies SA [3.10] has been criticised for not including objectives relating to economic impact. Representations consider that some housing policies, particularly HP5 and HP6, could adversely affect the viability of the two Universities in the City. This matter was discussed at length at hearing sessions of the examination and for the reasons that I give later in this report I am not convinced by any evidence submitted that, with the main modifications that I recommend to these two policies, their implementation will have a significantly detrimental economic impact on the Universities. I conclude that the SA process for both parts of the Plan is generally satisfactory, except for the consistency of scoring of impacts of development proposals on some Listed Buildings and the appraisal of residential proposals for land at Ruskin Fields within the Old Headington Conservation Area.
 22. With regards to these matters it is not clear that the most appropriate strategy has been selected and that the Plan is sound. To rectify the first of these concerns, errors in the SA [3.9] concerning the Listed Buildings have been corrected and an Erratum Note has been produced [3.9b]. English Heritage has confirmed its agreement to those changes in a statement of common ground [8.18.2].
 23. The Ruskin Fields proposals were first put forward in response to the Council's call for sites and possible links to the Barton Area Action Plan Local Plan (AAP). They were carried forward to the Preferred Options stage of the AAP and were SA tested [1.10]. Partly as a consequence of the unfavourable conclusions of that SA they were not carried forward in the AAP or to the Pre-Options stage of this Plan. However, it is not clear from the SA process that all of the most up-to-date evidence submitted by the promoters of the Ruskin Fields site was taken into account. Furthermore, the site should have been separately SA tested in respect of this Plan using its pro forma and methodology, rather than being rejected partly on the basis of a SA for another local plan.
 24. To rectify this weakness in the Plan's SA process, the SA of the Ruskin Fields

site was re-run and an Addendum to the SA was produced [8.15]. This was subjected to a six week public consultation period commencing 27 July 2012 and consideration by the full Council on 20 September 2012. With this additional testing of the two main options for proposed development, together with a third non-allocation option (Option 1) at Ruskin Fields the SA process is robust. I consider the conclusions of the Addendum SA, which are contested by the promoters of the site, later in this report. However, since the SA is not subject to examination I have not made any formal recommendations specifically in its regard.

25. The Plan is consistent with the housing elements of the Spatial Vision and Objectives of the CS, and its policies and proposals complement those of the CS. However, there is a gap in the policy coverage of the Plan that is inconsistent with the requirements of the CS and national policy, which thereby makes the Plan unsound.
26. CS Policy CS26 sets out criteria for assessing proposals for accommodation for travelling communities, and supporting text informs that a subsequent local plan will consider the suitability of sites, if needed. However, the Plan, which is the appropriate local plan, is silent on this matter. To rectify this and to make this part of the Plan sound and compliant with national policy (**MM9**) would insert a new sub-section, 'Homes for Travelling Communities', after policy HP8. This would explain that there is insufficient evidence of need or site deliverability to justify the allocation of a site specifically to provide accommodation for travelling communities. It also clarifies that sites allocated for general purpose housing may be used for traveller pitch accommodation provided that the criteria of policy CS26 and any other relevant LP policies are met. Also, that the Council is working with neighbouring local authorities to produce a new Traveller Accommodation Assessment that is anticipated to be completed in 2013, which will be a material consideration in assessing proposals for traveller sites.
27. Except where I have indicated later in this report and have made recommendations for main modifications, all of the policies and proposals of the Plan are effective and deliverable. Viability implications and infrastructure requirements have generally been satisfactorily considered and the implementation and monitoring strategy has been adequately set out in the Plan. The policies and proposals of the Plan are generally consistent with national planning policy, as set out in the Framework and other relevant legislation, but in some cases this is not entirely clear from the specific policy wording. Thus main modifications are necessary for their soundness. I refer to these later in my report. A number of representations were made in response to the consultation on the compliance of the Plan with the Framework, but these refer mainly to site specific policy matters, which I comment upon elsewhere in the report.
28. I conclude that with the main modifications referred to above the Plan generally meets the soundness requirements of the Framework.

Issue 2 – Provision for Affordable Housing

Whether the policies for affordable housing will achieve Objective 1 of the Plan, are consistent with the CS, and are sound.

29. Policies HP3, HP4 and HP6 respectively detail how provision for affordable housing will be sought from large housing sites with capacity for 10 or more dwellings, small housing sites with capacity for 4-9 dwellings and from student accommodation development that includes 8 or more bedrooms, in order to achieve the Plan's first Objective; to increase the supply of affordable housing reflecting local demand for different types of tenure. This Objective is clearly consistent with the section 7 of the CS Spatial Vision to 2026, which acknowledges that Oxford has a major housing shortage and has a key priority to provide more affordable and family homes. It is also consistent with section 7 of the CS Strategic Objectives, to plan for an appropriate mix of housing tenures, types and sizes to meet existing needs and future population growth.
30. CS policy CS24 states that generally a minimum of 50% of qualifying residential developments must be provided as affordable housing and it identifies a cascade approach to deal with sites that are demonstrably unviable at the 50% level. This target was carried forward from the LP and was found sound at the CS examination. The threshold for qualifying sites is also defined in the LP, as sites of 0.25 hectares or more, or where development would provide 10 or more dwellings. However, the supporting text to policy CS24 commits the Council to review the threshold and the mechanism for delivery through a subsequent local plan. This Plan is the appropriate document for this review. Policies HP3 and HP4 provide the details necessary to increase the supply of affordable housing and to achieve Objective 1.
31. In assessing whether the threshold for HP3 is still fit for purpose several matters have been taken into consideration, including the continuing very high demand for affordable homes in Oxford, which exceeds the anticipated annual delivery of general purpose housing, and the profile of sites that come forward for residential development. Annual Monitoring Reports (AMRs) indicate that over the five previous years from 2006, the majority of housing development has occurred on sites below the qualifying threshold size/capacity, which justifies retaining the current threshold. Higher and lower thresholds were tested at the Preferred Options stage and the reasons why those alternatives were rejected are provided in Background Paper 11: Affordable Housing [3.27].
32. Evidence provided in the AMRs since 2006 indicate that both the threshold and the target for seeking on-site affordable housing provision have been quite successful, although not entirely met. However, to further justify the target for policy HP3 the Council commissioned an Affordable Housing Viability Study (AHVS) [4.1] to assess viability options, which are summarised in Background Paper 11. The methodology uses a bespoke financial model tailored specifically for Oxford which looked at a sample of 14 actual, potential sites having a capacity ranging between 1 and 180 dwellings. The model uses the standard approach of residual land value appraisals to arrive at a land value for each site for residential development, taking account of the cost of developing the site, including planning costs and requirements, and the profit margin expected by the developer, which is assumed to be 20%. It indicates that, assuming a tenure split of 80% social rented and 20% shared ownership, 9 out of 14 sites would be viable after making a 50% contribution. Of these, 7 of the 9 sites with capacity for 10 or more dwellings would be viable. Information on property sales values was based on 'Hometrack', which is a leading online valuation service, and was reinforced through discussions with local property

agents.

33. The AHVS was updated [8.49] in the light of changes to the market value of residential properties in Oxford since the original study was prepared in 2010. It also uses revised assumptions relating to financing and the sizes of affordable and market units. The update, which was consulted upon during the examination, indicates that 11 out of 14 (78%) sites overall would be viable whilst complying with either HP3 (threshold of 10) or HP4 (threshold of 4-9). It concludes that 78% of the sites above or at the threshold of 10 would be viable and that 100% of the sites of 4-9 dwellings would be viable. This confirms that the targets of 50% for the sites with capacity for 10 or more dwellings and for a financial contribution on sites of 4-9 dwellings, as detailed in Appendix 4, are appropriate in the current economic climate. Expressed as a minimum, it would not prevent the Council from seeking greater than 50% provision if justified by an upturn in the housing market.
34. The AVHS has been criticised, primarily for the use of existing use values, and the assumptions made on various elements of development costs, but no alternative evidence that is more convincing has been submitted to the examination. I conclude that the AVHS, as updated, is robust and reflects current best practise, which advises that viability assumptions should be based on current housing market conditions.
35. Evidence from the Oxfordshire Housing Market Assessment (OHMA) [6.7] and Oxford's Housing Register show that although there is a high level of need for all types of affordable housing, by far the greatest is for social rented housing. Thus the tenure split required by policy HP3 for 80% social rented homes, with the remaining affordable homes being provided as intermediate housing, is justified and strikes the most appropriate balance to achieve mixed communities across the City.
36. For effectiveness, **(MM3)** would insert supporting text to the policy and to the Glossary to clarify that affordable rented housing, as defined in Appendix 2 of the Framework, will not be accepted as a substitute for social rented homes due to the exceptionally high private rents in Oxford. However, this tenure type may be provided as part of the 20% intermediate affordable housing.
37. The cascade approach for levels and types of provision set out in policy HP3, which firstly permits an overall reduction in provision to 40%, then reduces the percentage of social housing and finally, in lieu, permits financial contributions for off-site provision, in accordance with a formula set out in Appendix 2 of the Plan, transparently and flexibly deals with possible site-by-site viability issues. It is underpinned by proportionate evidence, consideration of alternatives and is consistent with the approach advocated in the Framework.
38. Taking account of the robust evidence contained in Background Paper 11 [3.27] that supports in principle the reduction of the threshold for sites qualifying for affordable housing provision, policy HP4 seeks provision from small housing sites between 4 – 9 dwellings, which make up a significant proportion of residential development sites coming forward in the City. However, for the practical consideration of managing very small numbers of affordable homes over numerous sites, the Council does not consider that on-

site provision is the most appropriate and effective delivery mechanism. Instead, policy HP4 seeks a financial contribution in accordance with the formula detailed in Appendix 2 of the Plan.

39. The implications for viability and overall housing delivery of applying the formula was tested in the AVHS, but as it referred to only 5 sites I considered this testing to be insufficiently representative. To make the appraisal robust the Council commissioned Additional Viability Testing - Smaller Sites [8.50], which was completed and consulted upon during the examination. A further 8 sites that provide a range of between four and nine units were tested. The sites are based on completions during the last two years, which provide a good reflection of the type and nature of sites that developers are seeking to deliver in the current economic climate and market conditions. The same methodology was applied to these sites as for those within the original study, including assessment of existing use value, together with build costs derived from the Building Cost Information Service (BCIS) and industry standard fee and contingency rates. The additional testing confirms that the requirements of policy HP4 are justified and effective.
40. However, the policy does not allow the flexibility of provision of on-site affordable housing where this is acceptable to both the Council and the developer. To rectify this, **(MM4)** would add supporting and policy text that clarifies that, in appropriate circumstances, on-site provision may be provided in line with policy HP3.
41. At paragraph 7.4.1 the CS highlights the tension that exists between provision for student accommodation and general purpose housing, and the need to strike a balance between these two uses that often compete for the same sites to ensure that housing, and particularly affordable housing delivery, is not compromised. This conflict is exacerbated by the growing trend for colleges not associated with the two Universities to locate and expand in Oxford building on the 'Oxford' name, for which speculative student accommodation is being provided. As evidenced in the CBRE Affordable Housing Viability Study - Student Accommodation (CBRE Study) [4.2], such development often achieves higher land values than general purpose residential development because of the absence of the development cost associated with affordable housing provision, and thus it enjoys an incentive.
42. Consistent with this CS concern, this issue is picked up in paragraph A2.37 of the Plan, and Policy HP6 aims to address it by seeking provision for affordable housing from student accommodation development. Legal submissions were made in written representations and at the hearings on behalf of the Oxford University Colleges regarding their perceived inconsistency of this policy with the CS. The crux of these submissions is that neither CS policy CS24 nor any other saved LP policy requires provision for affordable housing from student accommodation development. Furthermore, it is argued that policy HP6 is internally inconsistent because it does not seek such provision from other non-Class C3 residential uses.
43. I do not support those arguments. Policy HP6 is consistent with the CS because it is clearly consistent with Objective 1 of the Plan, which in turn is consistent with the Spatial Vision and Strategic Objective 7 of the CS. Moreover, I do not consider that the challenge takes into account the subtle

change from the hierarchical relationship that was required between development plan documents by the now revoked Planning Guidance Note 12 and the requirements of paragraph 153 of the Framework, which does not entail the ranking of a suite of documents, but requires the production of a single local plan, with other plans being produced only where clearly justified. The justification for the Plan is, amongst other matters, the need for policies to address the urgent need to maximise delivery of an appropriate mix of high quality housing in Oxford, including that which is affordable.

44. Alternative methods and levels of delivery of affordable housing from student accommodation development have been tested, including the 50% on-site provision that would be required by HP3 and the financial contribution formula detailed in Appendix 2, but they have been rejected because they are not clearly viable. However, the CBRE Study demonstrates that the level of financial contribution sought from policy HP6 for off-site affordable housing provision, which is set out in Appendix 4 of the Plan as a formula based on the student accommodation floorspace proposed, is appropriate, justified and viable in most of the cases tested. The formula provides flexibility to take account of specific viability issues and it clearly relates the scale of the contribution sought to the scale of the development proposed. Thus I consider that the principle of policy HP6 is sound. However, there is insufficient justification to extend its application to other residential uses not falling within Class C3, as suggested in some representations, because the evidence does not indicate that those uses compete significantly with potential general purpose housing sites.
45. However, there are several shortcomings with the precise wording of the submitted policy and its supporting text that make it ineffective, which would be rectified by **(MM6)**. This main modification would raise the qualifying threshold from 8 to 20 student bedrooms, because in practice it is unlikely that schemes falling within the smaller threshold would come forward. For flexibility and consistency with the Framework on-site provision for affordable housing would be permitted where it is agreed by the Council and the developer that a mix of student and general purpose housing would be appropriate. Provision for negotiating the scale of financial contribution made to take account of viability considerations would also be added to the policy text.
46. In addition, to ensure that the policy, in combination with policies HP5 and CS25, does not swing the balance too heavily in favour of general purpose housing to the extent that the ability of the two Universities to expand and compete internationally with other universities is compromised, the exceptions to the policy would be clarified and extended. Additional exceptions would apply to sites that are allocated solely for student accommodation in the Plan, or proposals to redevelop/intensify student accommodation on a site with a main existing use for student accommodation, or on contiguous adjoining land. However, this does not infer that all such contiguous land is suitable for student accommodation. Such proposals for student accommodation would first need to pass the location tests of HP5 before the proposals are assessed against HP6. The exceptions also apply where the proposed student accommodation is necessary to enable either University to achieve or maintain its 3,000 student numbers threshold referred to in CS policy CS25, or where the Council agrees that the site is not suitable for, nor capable of being made

suitable for general purpose housing.

47. I conclude that with the main modifications referred to above the policies for affordable housing achieve Objective 1 of the Plan, are consistent with the CS, and would be sound.

Issue 3 – Mixed and Balanced Communities

Whether the policies of the Plan will promote inclusive and mixed communities, and are sound.

48. Objective 2 of the Plan aims to improve the balance of residential accommodation types across the city, including student accommodation, HMOs and other forms of specialist housing, for all of which there is substantial need in Oxford. Policies HP1, HP2, HP5, HP7 and HP8 specifically seek to achieve this by striking the most appropriate balance. They complement CS policies CS23 and CS25, and the Balance of Dwellings Supplementary Planning Document (SPD) [5.9].
49. The Council's starting point for addressing its significant housing shortage, especially for family housing, is to continue with its longstanding strategy of resisting the net loss of existing self-contained dwellings. Policy HP1 soundly seeks to achieve this by stating that permission will not be granted for any development that results in the net loss of self-contained dwellings on a site. It sets out criteria to ensure that where a proposal would result in the net reduction in residential accommodation, the remaining accommodation provides adequate internal and external living conditions and is compatible with its surroundings.
50. To ensure that new dwellings are accessible to all, including people with disabilities, and that they are adaptable to residents' changing needs throughout their lifetime, Policy HP2: Accessible and Adaptable Homes requires that all new housing development meets the Lifetime Homes standard. In addition, on sites of 4 or more dwellings it requires that at least 5% are either fully wheelchair accessible or are capable of being easily adapted for full wheelchair use, of which 50% must be provided as open market housing.
51. The Lifetime Homes standard is a widely used set of guidelines that aim to ensure the long-term sustainability and adaptability of new homes, which incur minimal additional build costs if designed in from the outset. Background Paper 8: Accessible and Adaptable Dwellings [3.24] provides robust evidence that justifies the threshold and target for the requirement, and it demonstrates that when considered against feasible alternatives the policy provides the most appropriate strategy. The submitted policy is flexible in that it only requires new dwellings to be easily adaptable for full wheelchair use. The supporting text to the policy informs that account will be taken of genuine practical and heritage constraints to this provision. However, the policy does not explicitly indicate that account will be taken of viability issues that may arise on individual sites. This is remedied by **(MM2)** which would add reference to viability considerations in both the supporting and policy texts.
52. CS policy CS25 aims to manage the tension that exists between providing for the accommodation needs of Oxford's large student population and for general

purpose housing by requiring that no more than 3,000 students of either Oxford Brookes University or the University of Oxford should be living outside of University provided accommodation, as a pre-condition of further academic or administrative university development. The intention is that this would free up homes that are suitable for the general housing market. Building on this, Policy HP5 sets out criteria for determining which locations are suitable for student accommodation development, taking account of accessibility to public transport and proximity to general purpose housing. It also sets other conditions for development, such as provision for indoor and outdoor communal space and preventing student car parking on the site or elsewhere in the City. These criteria have been used in the selection process for the allocation of sites suitable for student accommodation and they will also guide such windfall development.

53. The policy directs student accommodation development to sites adjacent to the main thoroughfares that are listed at Appendix 3 of the Plan, and to a district or city centre, in order to ensure that it is conveniently located for students, but is directed away from predominantly residential neighbourhoods. From the written and oral evidence, and my site inspections, I consider that all of the thoroughfares listed, including London Place, are appropriate locations for student accommodation, subject to compliance of such development with all other policies in the development plan.
54. Background Papers 4: The Identification of Sites for Student Accommodation [3.20] and 13: Student Accommodation [3.29], as updated during the examination by the note produced by the Council at my request; Need and Provision for Student Accommodation [8.48], soundly justify the principle and location criteria of the policy and they inform why alternative strategies have been rejected. They also demonstrate that together with the allocations for student accommodation, which provide sufficient sites to accommodate anticipated student accommodation needs over the Plan period, the policy will enable adequate flexibility for additional windfall student accommodation development to take place.
55. However, some of the supporting and policy text wording lack clarity and make the policy ineffective and unsound. It is unclear as to precisely which types of accommodation fall within the definition of student accommodation in the context of policy HP5 and other housing policies of the Plan. 'Student accommodation' is defined in the Glossary to the Plan, but for absolute clarity, **(MM42)** would refine it as being accommodation for students of 16 or more years of age. For further clarity, **(MM41)** would add a definition of graduate accommodation, which informs that this type of self contained accommodation is likely to fall within Use Class C3 and would not, therefore, be subject to policy HP5.
56. Part a. of the policy permits student accommodation development on or adjacent to an existing university, hospital or research campus, but reference to 'campus' also lacks sufficient clarity. This would be rectified by **(MM5)**, which would re-define these locations as 'university or college academic sites', or as 'hospital and research sites' in the Glossary, policy HP5 text and in supporting text throughout the Plan. This main modification would also replace 'bespoke' with 'purpose-built' in the last sentence of policy HP5. The meaning of 'adjacent' in the context of this policy is adequately defined in paragraph

A2.32 and does not require further clarification for soundness.

57. Oxford has a large number of houses that have been converted to HMOs amounting to around 9% of all households, of which around half are rented to students. Thus they play an important role in meeting housing needs in the City by providing shared accommodation that is affordable to a wide range of groups including families, young workers and students. But in some parts of the City their high concentrations are perceived to be resulting in changes in the character of those areas, arising from a higher than average number of transient households and local car parking problems. To address this, since February 2012 new proposals for HMOs have been subject to an Article 4 Direction, which the Council intends to use to prevent any further over-concentration of HMOs in areas where there are already significant numbers. In addition, the Council requires all HMOs to be licensed. The purpose of policy HP7, together with Appendix 5 of the Plan is to clarify how the Article 4 Direction will be implemented, by defining how 'over-concentration' will be assessed and by requiring demonstration of compliance with the Council's good practice guidance on HMOs.
58. The Article 4 Direction and policy HP7 are widely supported by residents, especially those living in areas including East Oxford and Headington, who perceive that high concentrations of HMOs in these areas are resulting in unbalanced neighbourhoods. However, the policy is strongly opposed by others, particularly those representing the National and Residential Landlords Associations, who consider that it is the antithesis of national policy that is moving towards greater permitted development rights. Also, that neither the concept nor the details of the policy are based on proportionate evidence and that it is likely to result in undesirable, unexplored consequences. Furthermore, that it has not been demonstrated that the Council has had due regard, especially to the needs of young people, as required by the Equality Act 2010.
59. With reference to this last concern, the policy makes no reference to the potential occupants of HMOs, or their age. The Equalities Impact Assessment (EIA) [3.41] was carried out at the time the policy was assessed through the SA [3.10], which was carried out taking account of a range of local needs, in particular, "meeting local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home." (SA Objective 3). The EIA was re-issued during the examination to clarify this approach for assessing the housing policies, which does not discriminate on the grounds of age [8.55]. I conclude that it demonstrates that due regard has been paid under section 149 of the Equalities Act. Furthermore, this approach, whereby local needs have been assessed through the SA, has also been found sound by Inspectors examining the Bournemouth and Manchester Core Strategies.
60. Circular 8/2010 recognises that a high concentration of HMOs can sometimes cause problems of anti-social behaviour and it informs that local authorities are able to use Article 4 Directions to control them. Thus HP7 is consistent with national HMO policy. Background Paper 14: Houses in Multiple Occupation [3.30], as updated during the examination by [8.43] summarises and pulls together evidence from various sources, including the Council Tax Exemption data for the City, the OHMA, The Corporate Plan and the National HMO lobby, to justify the need for the policy and to assess the relative merits of 4

alternative policy options. The Background Paper also explains and justifies why the policy's 20% threshold within 100 metres of street length either side of a proposed HMO site is an appropriate indicator of 'over-concentration'. I conclude that the evidence base to justify both the principle and the thresholds of the policy is proportionate and robust, and that the policy is justified and consistent with national policy.

61. Turning to its likely outcomes and effectiveness, the policy seeks to redress the imbalance in housing type provision across the City rather than to place a blanket restriction on the change of use of dwellings to new HMOs. There are many areas in Oxford and many streets within areas where HMOs are currently concentrated that are under the policy threshold, where new HMOs may be permitted by the policy. Thus the HMO market would not be unreasonably constrained, nor would the future availability of this type of affordable private rented houses be significantly restricted as a result of the policy. However, **(MM7)** is necessary for flexibility to take account of exceptional site-by-site circumstances, which may arise that would justify the relaxation of the policy.
62. The last in this suite of policies is HP8, which sets out criteria for the provision of new residential moorings for homes for boat dwellers. The Plan acknowledges that legally moored residential boats and their dwellers contribute to the cultural diversity of Oxford and that there is a demand for new moorings. However, it is not clear that the policy and its supporting text are underpinned by a clear understanding of the specific needs of boat dwellers in Oxford. Consequently, the policy is too onerous and will effectively thwart provision of new moorings. During the examination I requested that the Council meet with representatives of boat dwellers with a view to producing a statement of common ground and suggestions to make policy HP8 and its supporting text justified, effective and sound. Whilst full agreement could not be reached with this group on all of the Council's suggested changes, I consider that those contained in **(MM8)** are sufficient and necessary for soundness.
63. Additions to the supporting text would confirm the Council's intention to work with all relevant stakeholders to increase the supply of residential moorings and would clarify that such provision should not conflict with the operational requirements of the Canal and River Trust or the Environment Agency, or with navigational safety requirements. These locational requirements would also be reflected in the policy text. In addition, criterion c. would be amended by the deletion of the requirement for new moorings to have a water and electricity supply, since these facilities are not generally sought by boat dwellers and there is no justification for requiring them. For clarity, references in criterion e. to provision for access for emergency vehicles would be changed to provision for emergency services, because in practice the towpaths adjacent to residential moorings are generally too narrow to accommodate vehicles.
64. Representations have been made for provision in the Plan for co-housing opportunities in Oxford. However, these are not supported by robust evidence of need for or specific requirements for such development. Thus inclusion of policies or allocations for this type of development would not be justified or sound. Furthermore, the policies of the Plan do not prevent any of the sites allocated for residential development being developed for co-housing.

65. I conclude that with the main modifications referred to above the Plan will promote inclusive and mixed communities and would be sound.

Issue 4 – Sustainability and Design

Whether the policies of the Plan will secure homes that are of a high quality design, have a good standard of amenity, adequate cycle and parking provision, will support transition to a low carbon future in a changing climate, and are sound.

66. Policy HP9 requires development to respond to the overall character of the area, including its built and natural features and it sets out eight criteria which must all be met in order to achieve this. However, having regard to the exceptional quality of Oxford's built and historic environment, the policy surprisingly fails to make reference to this important design consideration. To remedy this omission, **(MM10)** would add supporting text at paragraph A3.2 that would inform that development should be inspired by Oxford's unique environment, upon which further guidance will be provided in the forthcoming Heritage Plan. The main modification also includes reference to this requirement as an additional criterion of the policy.
67. The effectiveness and consistency with CS policy CS21 of criterion g. of the policy, which requires developments of 20 or more dwellings to provide at least 10% of the site area as public open space, has been questioned. For clarity it has been suggested that the criterion should include specific reference to 'children's play space' and 'unrestricted' public open space, but such additions are unnecessary for soundness because both matters are generally understood to be included within the definition of public open space given in the Plan's Glossary. Detailed prescription would result in inflexibility. Nor would it be appropriate to include allotment provision within the 10% requirement, partly because they have restricted accessibility. Also, because the Green Spaces Study [6.13] indicates that there is a good distribution of allotment sites across the City.
68. The threshold for and proportion of open space have been carried forward from LP policy HS.22. Their application to the sites allocated in the Plan will result in provision of an additional 10 hectares of public open space throughout the City. However, the allocated development would result in a small reduction of around 2.5% in the proportion of accessible open space from the target of CS policy CS21 to maintain an overall average of 5.75 hectares of publicly accessible green space per 1,000 population. But as I discuss later in this report the allocation of sites aims to minimise net loss of public open space. Taking into account the pressing need to provide more homes, and the tightly constrained boundaries of the City I conclude that the threshold and proportion remain appropriate and do not result in inconsistency of the Plan with the CS target.
69. The last criterion of policy HP9 requires developments of 10 or more dwellings to be assessed against all relevant Building for Life criteria and to achieve the Silver Standard as a minimum. However, the scoring system was revised during the examination. **(MM10)** would revise the criterion, its supporting text and the monitoring targets to reflect this.

70. Policy HP14, its supporting text and Appendix 7 set out further design considerations to ensure that development provides reasonable privacy and daylight for the occupants of existing and new homes, which are generally sound. However, in recognition that the high density nature of student accommodation development may make the recommended 20 metres separation distance between windows of opposing habitable rooms difficult to achieve, especially on smaller constrained sites, **(MM11)** would add to paragraph A3.26 the caveat that this guideline will be applied flexibly where only student accommodation rooms are affected.
71. In line with the Government's revision of the definition of residential garden land, policy HP10 sets out clear, sound principles against which proposals for dwellings will be assessed.
72. Policies HP12 and HP13 provide criteria to ensure that development provides homes that are of an adequate and convenient size, and have direct and convenient access to an area of private open space, which soundly strike the appropriate balance between prescription and flexibility.
73. As required by the CS, policy HP11 sets a target for on-site renewable or low carbon energy for new homes and student accommodation. However, the policy does not refer to decentralised energy production because there are no actual schemes proposed or evidence that any may be forthcoming in the near future. The threshold for the policy is 10 or more dwellings, or 20 or more student rooms/500 square metres or more student accommodation. The target for both types of accommodation is 20%.
74. Both the residential threshold and the target have been carried forward from the LP and the Natural Resources Impact Assessment SPD [5.8], and have proven to be successful. The calculation of thresholds from student accommodation is set out in Background Paper 9: Energy Efficiency and Natural Resources [3.25], which indicates that 2 student rooms are broadly equivalent in size to a 1 bedroom flat. Nevertheless, the thresholds and target have been re-assessed to ensure that they remain fit for purpose. Higher and lower requirements have also been considered and rejected. The preferred requirements have been viability tested in both the AHVS and the CBRE Study.
75. The target has been criticised for being too low, but there is insufficient evidence that a higher target is feasible for most developments. The proposed target and threshold reflect the most appropriate balance between affordable housing and renewable energy provision, and are justified by robust evidence. However, for flexibility and to take account of circumstances where the policy requirements may not be achieved, **(MM2)** would add necessary reference in the policy to feasibility and viability considerations.
76. Policies HP15 and HP16 respectively set out minimum residential cycle parking and maximum residential car parking requirements and standards. Detailed car parking standards are given in Appendix 8. These are underpinned by robust evidence [4.6], which takes into account the different general levels of car ownership and parking demand within the inner (low) and outer (higher) parts of the City. However, for internal consistency and for alignment with the County Council's County-wide car parking requirements, which are supported by the same evidence [4.6], Appendix 8 should be amended in accordance

with **(MM43)**, which would clarify that the Council will encourage all dwellings outside the Car Parking Zones to have at least 1 allocated parking space. In addition, **(MM44)** would provide parking requirements for HMOs both outside and within the Transport Central Area. With these changes there are no outstanding objections to these policies from the County Council, as confirmed in the statement of common ground [8.18.5].

77. I conclude that with the main modifications referred to above the policies of the Plan will secure homes that are of a high quality design, have a good standard of amenity, adequate cycle and parking provision, will support transition to a low carbon future in a changing climate, and are sound.

Issue 5 – An Overview of the Soundness of the Sites Allocations

Whether the Plan allocates sufficient development land in the right locations to achieve its Objectives, the requirements of the CS and in accordance with national policy, and if there is a reasonable prospect that the allocations will be delivered during its timeframe.

The Amount, Types and Locations for Development

78. The RS and the CS include a target for a minimum of 8,000 dwellings to be provided in Oxford between 2006 and 2026. Whilst this will not fully meet Oxford's objectively assessed market and affordable housing needs, the evidence indicates that it remains appropriate taking into account the City's constrained boundaries and its unique character (CS examination Inspectors' report [5.2]). Nevertheless, the Council has sought to maximise housing delivery and it has not rejected any potential housing site that is suitable and deliverable on the basis that it is not needed to achieve the target.
79. Background Paper 20: Housing Land Supply [3.36], which updates the SHLAA 2011 [6.5], demonstrates that in combination with the strategic site allocations in the CS and in the West End Area Action Plan, other identified sites and housing commitments, the Plan makes provision for deliverable sites with an estimated capacity for 2,682 dwellings over the first 5 years, without relying on windfalls. This exceeds the 5 year requirement by 842 dwellings and equates to a 5 year supply of 145.7%. The AMRs indicate that Oxford has performed well in housing delivery, so in accordance with paragraph 47 of the Framework it would be expected to provide a 5% buffer, which can be comfortably achieved. Even a 20% buffer target would be exceeded by 474 dwellings, which would equate to a 5 year supply of 121.4%.
80. However, for accuracy but not affecting the overall numbers, all references to site SP31 should be deleted from the Plan in accordance with **(MM28)**, because development on this site is nearly completed. Also, since sites SP39 and SP46 are adjoining and are to be developed as one site, all references to policy SP46 should be deleted from the Plan, but its policy requirements should be included within policy SP39, as set out in **(MM32)**. Associated changes to the Policies Map are also necessary for soundness. The deliverability of some sites has been challenged in a few representations, but these are not supported by convincing, detailed evidence.
81. Background Paper 20 also confirms that there are enough deliverable and developable sites to provide 5,230 dwellings over the first 10 years, which exceeds the residual target of 3,680 by 1,550 dwellings. With the proposed

allocations, which are estimated to contribute 2,300 dwellings, enough sites overall are identified to deliver 96.2% of the 8,000 target. When anticipated windfalls, estimated as 100 annually [3.36], are taken into account it is probable that the minimum target will be exceeded. I therefore conclude that sufficient housing land is allocated in accordance with the development strategy of the CS and paragraph 47 of the Framework. However, for clarity and accuracy (**MM45**) would update Appendix 10, which provides the housing trajectory, with the latest information contained in the draft SHLAA 2012 [8.22].

82. The RS does not include an employment target for Oxford. To meet its identified employment needs the CS has allocated a strategic site at the Northern Gateway and employment sites at West End. In addition, its policy CS27 seeks to protect and modernise key employment sites. CS policy CS28 informs that other employment sites should be maintained and lost only in exceptional circumstances. Thus there is no need to identify new employment sites in the Plan, unless they replace an existing employment site which could be better located to help encourage mixed-use developments on larger residential-led sites, or encourage diversification of the employment base. Table 2 of the Council's Topic Paper [8.16.5] and Appendix 9 of the Plan list the employment sites allocated in the Plan. Table 3 [8.16.5] lists 5 employment sites that are allocated in the Plan for alternative uses. All of these allocations are consistent with the CS.
83. The Plan makes sound provision for health care, education and retail sites in accordance with the CS. The CS also indicates that the Plan should consider suitable sites for hospitals and medical research, the Universities, student accommodation and tourism. It is clear that all of these uses were adequately considered by the Council when considering development options for relevant suitable sites. Appendix 9 of the Plan lists all of the allocated sites and indicates suitable uses for them, which in most cases have not been contested. For flexibility, some sites are allocated for several uses.
84. Some representations are concerned that the Plan over provides for student accommodation at the expense of general purpose housing and greenfield sites. But only a handful of sites are allocated solely for student accommodation use. Others with this allocation are also proposed for general purpose housing. With the trend for an increasing number of colleges not associated with the two Universities to locate in Oxford it is difficult to estimate the likely need for student accommodation over the Plan period, but the evidence provided in Background Paper 13: Student Accommodation [3.29], as updated during the examination [8.48], demonstrate that the intended provision for around 2,200 student rooms is justified.
85. Conversely, other representations are concerned that insufficient provision is made for student accommodation, and that the reasons why some possible sites have been rejected are unclear. However, Background Paper 4: The Identification of Sites for Student Accommodation [3.20] clarifies how sites were selected for potential student accommodation provision and its Table 1 transparently summarises how all sites put forward for consideration perform against the criteria of policy HP5 and other considerations. It indicates that the selection process has been consistently applied to all potential sites, including contested site SP22, which would not comply with policy HP5.

86. Turning to the locations of the site allocations, Oxford is a small city that benefits from good public transport. Therefore all areas within it are relatively accessible. Consequently, all of the allocations are sustainably located. In line with Objectives of the CS and the Plan, the allocations also aim to promote regeneration. Eight sites; SP5, SP6, SP24, SP30, SP33, SP36, SP37, SP57 and SP64 are allocated within regeneration areas providing opportunities for new housing, educational facilities, a community centre, open space and leisure.
87. Consistent with the CS approach of focussing most development on brownfield land, only 15% of the land allocated for development is greenfield, with only one site allocated within the Green Belt for essential built development, which I consider later in the report. Although such allocations have been criticised in some representations they are necessary to ensure that a 5 year supply is clearly deliverable. In most cases these allocations will also provide a significant amount of new publicly accessible open space.
88. The allocations are proposed across most areas of the City with no significant concentration of development in terms of scale or quantum in any particular location. However, there is the perception by some that considerable development is proposed in the Headington area, in addition to that which has recently taken place, which is thought will result in detriment to residents' living conditions in terms of traffic and parking congestion, provision for open space, and design and privacy standards. The representations also request that an Area Action Local Plan is prepared for Headington to address these issues. But it is for the Council to decide which local plans it intends to prepare and to provide such details in its Local Development Scheme (LDS). The current LDS [5.12] does not include an Area Action Local Plan for Headington, nor does it fall within my role at this examination to recommend that one should be prepared.
89. There are four hospital sites in Headington which cover large areas, but they are already extensively developed by hospital buildings. Their allocation will generally result only in infill development and replacements of existing buildings. Nevertheless, it is clear from the written and oral evidence, and my site visits, that there is significant traffic and parking congestion in this area, which could be exacerbated by further development. Thus residents' concerns are understandable.
90. However, Policies HP9, HP10 and HP14 will ensure that the scale, density and bulk of the development is not excessive for the site, and that its design is satisfactory. In addition, CS policies CS13, CS14, CS17 and CS30 ensure that appropriate consideration is given to strategic transport and infrastructure issues. Furthermore, with regards to traffic related concerns, both the individual and cumulative traffic impacts of the Plan's allocations have been taken into account by the City and County Councils in City-wide traffic modelling for the Plan and the LTP [6.12]. These indicate that the following sites, which include the hospital sites, could exacerbate traffic related congestion; SP8, SP23, SP38, SP39, SP42, SP43, SP44, SP48, SP51, SP56, SP58, SP60 and SP61.
91. For mitigation, their respective policies require a reduction in on-site car parking provision. But to effectively minimise additional traffic congestion that could result from the proposed development, this general requirement should

be amended by **(MM17)**. This main modification would require development at these sites to reduce on-site car parking and to improve pedestrian, cyclist and public transport access. It would soundly address the potential adverse development impacts for Headington.

92. South Oxfordshire District Council (SODC) is concerned about the possible cumulative traffic impact of allocations around Littlemore. However, whilst some sites close to Sandford-on-Thames will change from employment to housing, their impact on transport infrastructure is likely to reduce, as peak time trips for housing are less.

Overcoming Constraints to Development

93. Oxford has an impressive and unique historic environment which the Plan tends to underplay in both its housing and site allocation policies. Furthermore, it is unclear from the precise wording of some site allocation policies if the potential impact of the proposed development on the numerous Listed Buildings, Conservation Areas and historically important archaeological remains have been adequately assessed and/or mitigated for. For consistency with paragraph 128 of the Framework, the following changes are necessary; **(MM24)** would add reference to the Listed Buildings on site SP23 and to the important contribution that the open spaces, mature trees and green corridor make to their settings, and that of the Old Headington Conservation Area. **(MM26)** would clarify the statutory requirements of development at site SP27 regarding the Bartlemas Conservation Area and nearby Listed Buildings. **(MM46)** would include reference to 'the settings' of heritage assets to policies; SP1, SP9, SP10, SP13, SP41, SP44, SP49, SP51, SP54, SP55, SP56 and SP61. With these main modifications I conclude that consideration of the impact of proposed development on the historic environment has been soundly addressed.
94. An underlying principle of the CS, which is carried forward to the Plan, is that areas with biodiversity interest make a vital contribution to the quality of life and should be protected. Background Paper 2: Green Infrastructure and Biodiversity Issues in the Identification of Sites [3.18] explains that to avoid direct impact from development, the internationally protected Oxford Meadow (SAC) and the several nationally protected sites (SSSI) within Oxford were filtered out of the selection process. Sites that were partly within a SSSI had their boundaries redrawn. The potential impacts of developing near to these protected sites alone or in combination were also considered.
95. The Habitats Regulations Assessment (HRA) [3.11] identifies that 8 sites have a potential impact on the SAC, either on the balanced hydrological regime and water quality, increased recreation pressure or air quality. The second stage of the HRA concludes that there is unlikely to be a worsening of air quality that would affect the SAC, and appropriate measures are proposed to mitigate recreational pressures, especially from dog walkers, by encouraging the use of other areas for recreation through provision of improved routes and facilities. In relation to the potential impact on water quality or groundwater flow, the relevant policies require that, at the planning stage, the impact should be assessed in detail and the size and scale of the development must be reduced until there are no adverse impacts. With these measures Stage 2 of the HRA is satisfied.

96. To assess impact on the SSSIs, a Source Receptor Pathway Analysis was undertaken and the Council's mitigation approach is set out in Background Paper 19: Biodiversity [3.35]. The New Marston Meadows SSSI is particularly sensitive to changes in the flows and quality of water to the River Cherwell, and the Iffley Meadows SSSI is sensitive to changes in the flows and quality of water to the River Thames. The Lye Valley SSSI is sensitive to change in the surface and groundwater of the area including both the flows and the quality of the water. The Brasenose Wood and Shotover Hill SSSI is particularly sensitive to recreational use pressure.
97. The Plan was amended by post publication changes contained in [3.4] to incorporate necessary mitigation measures identified in the HRA and suggested by Natural England, which has subsequently confirmed in its statement of common ground that it has no outstanding objections to the Plan [8.18.1].
98. However, the required mitigation measures are not clearly and precisely set out in all of the relevant policies, which render them ineffective and unsound. To remedy this, the following main modifications are necessary; **(MM14)**, **(MM16)**, **(MM29)**, **(MM31)**, **(MM32)**, **(MM34)**, **(MM38)** and **(MM39)**, which refer respectively to sites; SP6, SP8, SP33, SP38, SP39, SP47, SP61 and SP62, would clarify mitigation requirements in respect of the Lye Valley SSSI. I conclude that with these main modifications consideration of the impact of proposed development on the natural environment has been soundly addressed.
99. Flood risk is also a key issue for Oxford and was considered throughout the site selection process. A Strategic Flood Risk Assessment has been undertaken [6.6] and the Council has produced two Background Papers which update information on flood risk against the sites being considered for allocation. Background Paper 3: Flood Risk Sequential Test of Sites [3.19] assesses the Preferred Options applying the sequential test. It concludes that insufficient housing could be provided within flood zones 1 (86%) and 2 (8%) to meet the housing target and justifies considering sites in flood zone 3a. Site SP9 is mainly within flood zone 2 but parts of it fall within flood zones 3a and 3b. To correctly reflect the sequential test process in this case and to direct development away from areas of the site in the higher flood risk zones, **(MM18)** is necessary.
100. Background Paper 18: Flood Risk [3.34] refers to the Exceptions Test that was carried out on sites; SP1, SP4, SP7, SP18 and SP53, which have a combined capacity for 51 dwellings (6%). It concludes that subject to a site specific flood risk assessment being carried out for each of these sites to demonstrate that criterion c of the Test, which refers to flood warning and evacuation plans, can be satisfied, the Test is met in each case. This requirement is included within the supporting texts for these policies. The Environment Agency has confirmed in its statement of common ground that it has no outstanding concerns with any site allocations that go to the heart of soundness [8.18.7]. I conclude that concerns for flood risk have been soundly addressed.
101. Through consultation the Council has sought to minimise public opposition, and at the Preferred Options stage some sites were rejected as a result of strong objection. At the Publication Stage no site allocation was the subject of

more than 7 representations, the majority of which refer to specific policy wording. The remaining most contentious sites involve those with an existing use as a public car park or as open space.

102. In response to significant public opposition to the potential allocation of public car park sites, some were rejected at the early stages of the site selection process. However, sites; SP14, SP52 and SP59 have been retained and are allocated for residential/student accommodation and, in the case of SP14, employment use also. These site policies require the retention of 'sufficient' car parking and alternative temporary car parking provision during the development construction period. However, there remains local concern that if insufficient, conveniently located public car parking is not retained at these sites, businesses at the adjacent centres will suffer. This clearly would not promote positive, sustainable planning, nor is it the Council's intention to provide obstacles to the viability of local businesses. Therefore, for effectiveness and to address these concerns, **(MM20)** is necessary. It would clarify that sufficient car parking should be retained at a level reasonable to serve and safeguard the vitality of the area, that overall the number of spaces should not be significantly reduced and that during construction provision must be made for local, temporary public car parking.
103. The Council has sought to minimise the loss of greenfield sites and consistent with CS policies CS2 and CS21, and the Framework, the Plan seeks to ensure that the loss of any open space resulting from its allocation will be compensated for by equivalent or better provision in terms of quantity, quality, location or accessibility. Background Paper 21: Open Space [3.37] clarifies this approach and it lists all of the sites that contain open space that are allocated for development. They are; SP3, SP4, SP15, SP21, SP22, SP25, SP27, SP29, SP36, SP45, SP50, SP53, SP54 and SP61. The loss of some of these open spaces has been criticised and the evidence base supporting their allocation has also been questioned. But in principle, I consider that all of these allocations are supported by proportionate evidence, including that contained in the Oxford Green Spaces Study [6.13] and the Playing Pitch and Outdoor Sports Strategy 2012-2026 [4.4b], and are sound.
104. With the exception of SP4, where the recreation ground and play area would be replaced, the open spaces at the remaining sites currently have limited public access. Most are private and are surplus to the owner's requirements, and there is little prospect that their public use will be extended if they are left undeveloped. The policies for these sites require provision of beneficial, compensatory, substantial areas of additional open space, of good quality, in convenient locations that is publicly accessible. However, for soundness the precise wording of several of these policies requires amendment.
105. SP15 is a formal allotments site that fell into formal disuse many years ago and has become overgrown. It is allocated for residential development with retention of 25% of the gross site area to provide public open space. The supporting text acknowledges that consent from the Secretary of State would be required to remove the allotment designation. However, recently the local community have become actively engaged in fostering community spirit and self help, which is partly expressed through a renewed interest in food cultivation at this site on an informal basis.

106. In response to the strong written and oral representations that have been made that seek that a higher proportion of the site to be retained as open space and for allotment use the Council suggests **(MM21)**, which would reduce the public open space provision of the submitted policy from 25% to 10%, but would additionally retain 20% of the site as allotments. Whilst residents are seeking a higher proportion of the site to be retained as allotments, taking into account the current scale of informal allotment use at this site, the availability of other allotment gardens nearby and the desirability of making the most beneficial use of land I consider that this main modification strikes the most appropriate balance, and is justified and sound.
107. Site SP21 is also a greenfield site that contains allotments. Most of the site is located within a sensitive, narrow strip of Green Belt, between Oxford and the SODC area. In order to accommodate expansion plans for car manufacturing at the neighbouring site SP50 it is intended that all of the existing indoor and outdoor sports facilities will be re-located at SP21. However, to ensure that non-essential built development associated with the re-located sports facilities will be located on the non-Green Belt part of the site **(MM23)** is necessary. It would replace 'should' with 'will'. **(MM35)** would clarify that all existing outdoor sports fields and associated indoor facilities at SP50 must be re-provided elsewhere in the locality.
108. More controversially, policy SP21 and its supporting text also state that planning permission will be granted for wind turbines at the site. However, previous planning proposals for such development at this site have been unsuccessful and it is unclear how renewable energy development and outdoor recreation could be successfully combined at this site. Furthermore, the policy very questionably in this particularly sensitive Green Belt location assumes that a planning application for wind turbine development, which is inappropriate development in the Green Belt, would be able to demonstrate very special circumstances that would outweigh the harm of such development by reason of its inappropriateness and any other harm. The certainty which this gives to renewable energy development is therefore unjustified, ineffective and inconsistent with national policy. To remedy this element of unsoundness **(MM23)** would remove all references to wind turbines from policy SP21 and its supporting text.
109. Development of site SP27 is likely to result in the loss of a cricket pitch on this university college sports ground. The policy requires that the pitch must either be retained or an alternative suitable site must be found. However, there is limited public access to this facility and the evidence in [4.4b] does not clearly demonstrate that there is a shortfall in public cricket pitch provision in this area. Therefore, this policy requirement is not clearly justified. **(MM26)** would provide necessary flexibility to the policy by substituting the word 'provision' for 'site'.
110. To make policy SP34 consistent with other policies of the Plan that allocate open space for development and which require compensatory provision, **(MM30)** would add this requirement to the policy and its supporting text. **(MM36)** would delete from policy SP53 the requirement to provide alternative playing field provision because a financial contribution has already been paid in lieu of the former tennis facility at this site. Further compensation for its loss is not justified.

111. I conclude that the allocations minimise the loss of public car parks and open space and that with these main modifications such loss is adequately mitigated for.

Feasibility of Delivery

112. There is a high level of commitment by landowners and developers towards delivery of all of the allocated sites. Landowners were contacted at each stage of the site selection process and sites were rejected if the landowner could not be contacted or is not committed to developing the site during the timeframe of the Plan, or if they are not intending to develop uses that are considered suitable on the site.

113. The Council has also worked closely with infrastructure providers including for transport, education, health care and utilities. There is no 'show stopping' or substantial infrastructure provision required in respect of the site allocations either individually or cumulatively. None of the LIP partners have made representations objecting to infrastructure provision, nor have they expressed concern that necessary infrastructure may not be provided in tandem with the development proposals. However, SP4 omits the railway symbol, which is a necessary infrastructure provision requirement that would be rectified by **(MM13)**.

114. The Council has also worked closely with the utility providers and none have raised concern in respect of any of the allocations. However, Thames Water have identified that, in some cases, necessary upgrading to overcome water or waste water capacity issues may require further investigation, which can only be carried out in respect of detailed development proposals. In these cases provision cannot be fully planned for at this stage, thus the delivery of the affected sites may be delayed. In order to clarify this in respect of sites; SP3, SP4, SP5, SP7, SP23, SP25, SP26, SP34, SP37, SP38, SP41, SP48, SP49, SP51, SP61 and SP65 **(MM12)** is necessary.

115. Most of the site allocations infrastructure and other on and off-site requirements have been costed and, with reference to Background Paper 28: Infrastructure [8.5a], it is anticipated that they will be mostly funded through CIL and Section 106 contributions. The AHVS takes account of these likely development costs, including provision for affordable housing and indicates that infrastructure provision is unlikely to significantly impede development delivery.

116. I conclude that with the main modifications referred to above the Plan allocates sufficient development land in the right locations to achieve its Objectives, the requirements of the CS and in accordance with national policy, and that all of the site allocations are fundamentally sound. Also, that there is a reasonable prospect that the development allocated will be delivered during its timeframe.

Issue 6 – The Soundness of the Site Allocations

Whether all of the uses permitted and the policy requirements for each of the site allocations are justified, effective and consistent with national planning policy.

117. The site allocations permitted uses and policy requirements are clearly based on very detailed knowledge of the sites, their constraints and their green, social and physical infrastructure requirements. Although there have been several representations to the contrary, from the written and oral evidence submitted to the examination I consider that the permitted uses are generally the most appropriate. They are justified by transparent selection criteria and they provide adequate flexibility for site development. In most cases, the requirements and conditions of the policies are also justified, effective and consistent with the Framework. But there are a few exceptions that require amendments to their specific policy wording to make them sound.
118. With the main modifications referred to previously in this report all the site allocations would be consistent with national planning policy. However, the requirements of policies SP6 and SP7 are not justified by the evidence. SP6 requires the retention of two barrack buildings and a stone wall, which are referred to in the policy as being of local interest as one of the last historic references to the military heritage of Cowley. However, neither the buildings nor the wall are included in a statutory or local list of buildings of heritage interest, there is little evidence to support the contention that they are worthy of retention and it is unclear how they could be effectively converted to the permitted residential or student accommodation uses in compliance with the housing policies of the Plan. The retention of this requirement, which is not justified by the evidence, could make the site unattractive and unviable for delivery. In recognition of this, **(MM14)** would remove this unsound requirement.
119. Policy SP7 specifies the types of development that must be included in a mixed-use proposal for this site, one of which is the provision of a new bridge over the Oxford Canal. But this requirement is not clearly justified and could stall the delivery of this site, which has had a chequered planning history. There is an existing footbridge crossing of the canal a short distance to the north of the site. Furthermore, the required provision of a new footbridge relies on obtaining an agreement with a third party landowner on the far side of the canal. In addition, no assessment has been made as to whether a new bridge could be accommodated within the width of the canal bank. To address these matters and to provide flexibility, **(MM15)** would instead require the provision of an improved crossing over the canal. This main modification would also make the policy effective by improving the clarity of its wording regarding the boatyard facilities to be provided.
120. For effectiveness, **(MM18)** would clarify the types of residential uses that would be acceptable on site SP9. **(MM19)** would clarify that the main pedestrian access to student accommodation development at site SP12 should be from the south west corner of the site, to minimise pedestrian movements past residential properties. The supporting text to policy SP19 inaccurately refers to Cuckoo Lane as being a pedestrian and cycleway. **(MM22)** would correct this by deleting 'cycle route', and it would clarify that Cuckoo Lane should be retained as green route that would be wide enough to support its additional role as a wildlife corridor. Also necessary for effectiveness, **(MM25)** would clarify that if key worker housing is provided as affordable housing at site SP25, it will contribute towards the general provision for affordable housing at this site.

121. Policies SP30, SP32, SP35, SP36 and SP57 all apply to sites that are owned by the County Council and have existing uses as care homes or for special education provision. However, the submitted policies provide the County Council with insufficient flexibility to manage their future provision for these facilities and to make effective alternative use of some of these sites which may become surplus to these needs during the Plan period. This is acknowledged in a statement of common ground between the City and County Councils [8.18.6] and is remedied by **(MM27)**.
122. Also for effectiveness to make policy SP55 consistent with the Plan's definition of graduate accommodation, as defined by **(MM41)**, **(MM37)** would include graduate accommodation as a permissible use of the site. Policy SP65 and its supporting text are also ineffective because whilst the noisy location of the site adjacent to the A34 is acknowledged, they fail to indicate that noise mitigation measures may be necessary to make the site suitable for its proposed residential and open space uses. For flexibility, the feasibility of possible complementary provision of small scale employment units and community facilities at this site should also be referred to. **(MM40)** makes these amendments that would make this policy sound.
123. I conclude that with the main modifications referred to above all of the policy requirements for each of the site allocations are justified, effective and consistent with national planning policy.

Issue 7 – Omission Sites

Whether there are any other sites that should be allocated in the Plan.

124. It is the intention of the Plan to allocate all sites that were found to be suitable for the uses proposed by the rigorous and transparent filtering process set out in Background Paper 1 [3.17]. Through this process, sites were rejected for a variety of reasons, including; site size and characteristics or that the uses put forward conflicted with the CS and the Framework, biodiversity designations, Green Belt, flood risk, environmental, physical, landscape or heritage constraints, or deliverability. However, the Plan makes clear that even though a site is not allocated it may nevertheless be suitable for development and may be granted planning permission.
125. The site allocations meet the relevant targets of the RS and the CS with an appropriate contingency surplus. They have all been subject to full SA and, subject to the main modifications in this report, are all sound. Therefore, it is unnecessary to make further allocations to make the Plan sound. Of the sites rejected during the various stages of the selection process only 9 have been carried forward in Publication Stage representations. Taking into account the written and oral representations, and my visits to these sites, I have considered if they should have been allocated on the basis of the Council's methodology for site selection, as set out in Background Paper 1.
126. OS1 Bartlemas Nursery is a brownfield site within the Bartlemas Conservation Area and at 0.24 hectare in area is just below the threshold size for selection (0.25 hectare). It is constrained by surrounding Listed Buildings, the Conservation Area designation, its access, trees and a ditch on the site. Therefore, its deliverability is uncertain. Furthermore, allocation for specific

uses could limit the opportunity to find a suitable use for this sensitive site that could come forward through the planning application process as a windfall. Therefore, I conclude that it was appropriately rejected for allocation for reasons of its small size and its deliverability.

- 127.OS2 Colthorn Farm is a greenfield site adjoining the Green Belt that is rural in character and which makes an important contribution to the setting of the Old Marston Conservation Area, which is dominated by tree belts and visible remains of the open fields of the medieval system of land tenure. The Landscape Character Assessment [8.54] notes the importance of the rural landscape and the need to conserve the largely intact field system that is still visible on the outskirts of Marston. I conclude that the site was appropriately rejected for landscape and heritage constraint reasons.
- 128.OS3 Jowett Walk is partly developed and the remaining area is 0.19 hectare, which is significantly below the size threshold for allocation. Consequently, I conclude that the site was correctly rejected for allocation because of its very small size.
- 129.OS4 Land at Frideswide Farm is a Green Belt site. However, CS policy CS4 only allows for Green Belt release in relation to the Northern Gateway strategic development site. Thus I conclude that the site was appropriately rejected for Green Belt and CS policy reasons.
- 130.OS5 Osney Mead is a protected key employment site for Class B1, B2 and B8 uses. It is the only industrial-type estate close to the City centre and it therefore has a role in maintaining a diverse employment base within Oxford. The University of Oxford seek for flexibility, the allocation of parcels of land within the estate for academic/research uses requiring a Class B setting. However, allowing academic uses on this site would reduce its employment opportunities contrary to CS28. There are other opportunities for the proposed uses at sites SP23 and SP60. Therefore, I conclude that the site was correctly rejected for CS policy reasons.
- 131.OS6 Oxford Retail Park - land is sought to be allocated as an extension to the existing out-of-centre retail park. However, no supporting evidence has been submitted to the examination to demonstrate need, compliance with the sequential test of the Framework and CS policy CS31, and that there would be no adverse impact on the vitality and viability of other existing centres. Therefore, I conclude that the site was correctly rejected for policy reasons.
- 132.OS7 River Hotel and Westgate Hotel are adjacent sites that individually fall below the size threshold for allocation, but would have a combined area of 0.3 hectare. However, combining the sites is artificial as they are separated by a road. No convincing reasons have been provided as to why they should be considered to be inextricably linked or the planning merits in doing so. Consequently, I conclude that these sites were correctly rejected for allocation because of their small size.
- 133.OS8 Ruskin Fields is a greenfield site within the Old Headington Conservation Area, which is being actively promoted for residential development by Ruskin College. The Addendum to the SA [8.15] tested 3 options for the site based on the several schemes and a substantial amount of supporting information

- submitted by the promoters. The options considered were; 1-non-allocation, 2 - allocate for between 150-193 dwellings with 50% being affordable homes and new public open space, and 3 – allocate for 69-90 dwellings with 50% being affordable homes and with a significant area of new public open space.
134. The Addendum SA concludes that Option 1 is preferred. It notes that it would not result in affordable homes or new public open space, but it would protect views into and out of the Conservation Area and it would protect the biodiversity of the site. It acknowledges that Option 2 would promote the efficient use of the site, promote delivery of affordable homes and would also deliver some open space, but it would have significantly adverse effects on the Conservation Area and the biodiversity of the site. Also, that the site is not particularly well connected to local services and would offer no new services. Option 3 would result in lower levels of housing and affordable homes, but a larger area of open space, but it is concluded to have the same limitations as Option 2 in terms of the Conservation Area, biodiversity and access to/provision of local services.
135. At the hearing session the Council conceded that its evidence over-estimates the biodiversity value of the site. The promoters of the site conceded that the larger scheme would have a significantly adverse affect on the character of the Conservation Area. I concur with those conclusions. Furthermore, the larger residential scheme has not received clear support from the County Council, as Highways Authority, for its access provision. Its delivery having regard to its access is therefore uncertain. I therefore conclude that the Option 2 proposal was correctly rejected for heritage and delivery reasons.
136. Regarding Option 3, whilst the Highways Authority would support a vehicular access from Foxwell Drive, such provision would result in loss of an area of green space owned by the Council for which residents in Northway are seeking Town Green status. Thus access provision is uncertain for the smaller option also. Furthermore, taking into account all of the written and oral evidence, and my views of the site from several short and long distance vantage points, I entirely agree with the conclusions of the Old Headington Conservation Area Appraisal [2.1] that the Ruskin Fields create an important open setting to the tightly knit historic core of the Conservation Area that is fundamental to its intrinsic character.
137. Whilst development could feasibly be designed and laid out to preserve the appearance of the Conservation Area and to safeguard the ecological importance of the hedgerows and trees that form the Fields' boundaries, development, no matter how sensitively designed, would inevitably result in the reduction of and would be intrusive in views of this green wedge and would have an adverse impact on the distinctive character of the Conservation Area. I conclude that such harm to the Conservation Area would not be outweighed by the individual or cumulative benefits of affordable housing, open space provision and improvements to pedestrian and cycle links. Consequently, I further conclude that the Option 3 proposal was correctly rejected for heritage and delivery reasons.
138. OS9 Oxford Stadium, which is owned by the Greyhound Racing Association was considered by the Council as a potential housing site from the Pre-Options consultation stage but was rejected after the Preferred Options consultation.

At this time its deliverability is uncertain because attempts by the Council to contact the site owners for over a year regarding their intentions for the land had failed. In addition, its possible redevelopment for housing was the subject of substantial public opposition. I conclude that this site was correctly rejected because its deliverability is uncertain.

139. I conclude that the site selection process has been properly applied to these sites and that there are no other overriding reasons why any should be allocated to make the Plan sound.

Assessment of Legal Compliance

140. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Plan is identified within the approved LDS (April 2012) which sets out an expected adoption date of February 2013. The Plan's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in October 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM).
Sustainability Appraisal (SA)	SA has been carried out and with refinements made during the examination is adequate.
Habitats Regulations Assessment (HRA)	The HRA has been carried out and is adequate.
National Policy	The Plan complies with national policy except where indicated and main modifications are recommended.
Regional Strategy (RS)	The Plan is in general conformity with the RS.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

141. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

142. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Sites and Housing Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Shelagh Bussey

Inspector

This report is accompanied by the Appendix containing the Main Modifications

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Reference	Policy / Para / page	Description of change
MM1	Page 7, New policy and text	<p>Insert new text: <u><i>"National Planning Policy Framework xiii) Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally."</i></u></p> <p>Insert new model policy: <u><i>"Policy MP1: When considering 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. It will work proactively with applicants jointly to find solutions which mean that applications for sustainable development can be approved where possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with Oxford's Local Plan* (and, where relevant, with neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, and unless:</i></u> <u><i>- 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; or</i></u> <u><i>- Specific policies in that Framework indicate that development should be restricted."</i></u></p>

		<i><u>*Oxford's Local Plan comprises of the Core Strategy, West End Area Action Plan, saved policies from the Oxford Local Plan 2001-2016. When this Plan and the Barton Area Action Plan are adopted they will form part of Oxford's Local Plan.*</u></i>
MM2	<p>Paragraph A2.15</p> <p>Policy HP2 (Accessible and Adaptable Homes)</p> <p>Policy HP11 (Low Carbon Homes)</p>	<p>Amend paragraph A2.15 to read: <i>"The City Council will publish a technical advice note, subject to update, detailing the Lifetime Homes and Wheelchair Accessible Standards. Applicants will be expected to demonstrate that Policy HP2 has been complied with in the Design and Access Statement. Account will be taken of any genuine practical, <u>viability</u> or heritage constraints."</i></p> <p>Insert additional sentence into Policy HP2 following part b to read: <i><u>"The City Council will take into account any evidence that applying these requirements would make the development unviable."</u></i></p> <p>Amend third paragraph of Policy HP11 to read: <i>"Planning permission will only be granted for qualifying developments where development proposals include at least 20% of their energy needs from on-site renewable or low carbon technologies, unless it can be robustly demonstrated that such provision is <u>either not feasible or makes the development unviable</u>. The energy statement must include details of how the 20% target will be achieved."</i></p>
MM3	<p>New paragraph after A2.20 (Policy HP3 Affordable Homes from Large Housing Sites)</p> <p>Glossary</p>	<p>Insert additional paragraph A2.21. Renumber subsequent paragraphs: <i><u>"Affordable housing must be truly affordable to those that need it. The City Council will require at least 80% of affordable housing provided on-site to be social rented. Due to exceptionally high private rents in Oxford, the alternative 'affordable rented' tenure will not be accepted as a substitute for social rented homes. Up to 20% of the affordable homes provided on-site may be provided as affordable rented or as other types of intermediate housing."</u></i></p> <p>Amend definition in Glossary: <i>"Intermediate affordable housing</i> <i>Housing at prices and rents above those of social rent, but below market prices or rents. These can include shared ownership, <u>affordable rented housing</u> and intermediate rent. The Council will consider the suitability of other forms of intermediate housing, such as low-cost market</i></p>

		<i>housing, in light of its genuine affordability to those in housing need. (Key worker housing is defined separately from intermediate affordable housing.)"</i>
MM4	<p>Paragraph A2.23</p> <p>Policy HP4 (Affordable Homes from Small Housing Sites)</p>	<p>Add new paragraph to follow paragraph A2.23: <i><u>"In appropriate circumstances, provision may be made as on-site affordable housing. The City Council and the applicant must agree that on-site provision is appropriate. On-site provision would be expected to make up generally a minimum of 50% of dwellings on the site, unless viability evidence demonstrates a need to reduce this."</u></i></p> <p>Add the following paragraphs to Policy HP4, to follow the first paragraph: <i><u>"Where both the City Council and the applicant agree that on-site affordable housing is appropriate, planning permission will be granted if generally a minimum 50% of dwellings on the site are provided as affordable homes.</u></i></p> <p><i><u>If it can be demonstrated to the City Council that the full contribution would make the development unviable, the City Council will accept a lower contribution, in accordance with Appendix 2 (paragraph 6)."</u></i></p>
MM5	<p>Policy HP5 (Location of Student Accommodation)</p> <p>Paragraph B1.18 Paragraphs B2.59 (SP23 John Radcliffe Hospital) Paragraph B2.141 (SP61 Warneford Hospital) Paragraph B2.145 (SP62</p>	<p>Amend part a of the policy to read: <i>a. on or adjacent to an existing university campus, higher or further education college or college academic site*, or other hospital or <u>and research campus site</u> (and only if the use during university terms or semesters is to accommodate students being taught or conducting research at that site), or</i></p> <p><i>*see Glossary definitions</i></p> <p>Amend last sentence of Policy HP5 to read: <i>"Planning permission will not be granted for any proposal that results in a net loss of bespoke <u>purpose-built</u> student accommodation."</i></p> <p>Amend Paragraph B1.18: Replace "campuses" with "<u>university or college academic sites, hospital and research sites</u>"</p> <p>Amend Paragraphs B2.59, B2.141 and B2.145: Replace "teaching campus" with "<u>university or college academic sites, hospital and research site.</u>"</p> <p>Amend table following C1.7: Replace "college campus" with "<u>university or college academic sites, hospital and research site.</u>"</p>

	<p>Warren Crescent) Table following C1.7 in respect of HP5 Glossary</p>	<p>Add new definitions to Glossary: <u>"University or college academic site</u> <i><u>A site where the principal use is either for the teaching of students over the age of 16 years , or for academic research by students over the age of 16 years, or a combination of the two."</u></i></p> <p><u>"Hospital and research site</u> <i><u>A site used principally for hospital facilities, but which also includes an element of professional teaching or research for students over the age of 16 years."</u></i></p>
<p>MM6</p>	<p>Policy HP6 (Affordable Housing from Student Accommodation)</p>	<p>Amend paragraphs A2.37-A2.40 to read: <i>"A2.37 A key objective of the Core Strategy is to ensure that new residential development contributes to a balance of housing types and tenures, which in turn contribute to mixed and balanced communities. New student accommodation is often proposed on sites that could otherwise be developed for <u>general purpose housing</u>, which would include affordable homes as part of a wider tenure mix.</i></p> <p><i>A2.38 Policy HP6 therefore sets out how <u>student accommodation proposals should contribute to affordable housing delivery, to ensure that the objective of achieving mixed and balanced communities is met. The policy only requires a contribution to be made for This will apply on qualifying sites providing 8 20 or more student bedrooms that are otherwise suitable for general purpose housing.</u> as †This is broadly equivalent to 4 10 or more self-contained homes, (the threshold for applying Policy HP34). It is expected that, for <u>qualifying sites, a financial contribution will generally be appropriate. In certain circumstances, such as where mixed-use development is proposed that includes general purpose housing, provision may be made as on-site affordable housing, where the City Council and the applicant agree that on-site provision is the most appropriate way of creating mixed and balanced communities.</u></i></p> <p><i>A2.39 Where student accommodation is proposed as part of a mixed-use scheme, together with general housing and/or commercial development, account will be taken of the overall floorspace of all</i></p>

		<p>development on the site. Even if different uses each fall under the threshold for applying the relevant policy, the development as a whole may still trigger a requirement to contribute to affordable housing. As a general guide, and including communal areas such as shared kitchens, two purpose-built student bedrooms have a similar internal floorspace as a 1-bedroom flat, and four purpose-built student rooms have a similar internal floorspace as a 3-4 bedroom house.</p> <p>A2.40 If the applicant can robustly demonstrate that the sum required by applying the formula in Appendix 4 makes the scheme unviable, and this is accepted by the City Council, a lower contribution may be negotiated. This will be on the basis of the evidence submitted."</p> <p>New paragraph to read: <u>"A2.41 The policy will apply to all proposals for providing 20 or more student bedrooms on sites that are not allocated solely for student accommodation in this Plan, including windfall sites that are suitable for general purpose housing, except in the circumstances set out in the policy. In these circumstances the City Council will not seek a financial contribution or on-site provision towards affordable housing."</u></p> <p>Amend Policy HP6 to read: <u>"Planning permission will only be granted for new student accommodation that includes 8 20 or more bedrooms if a financial contribution is secured towards delivering affordable housing elsewhere in Oxford. The contribution will be calculated using the formula in Appendix 4. Alternatively, the affordable housing contribution can be provided on-site where both the City Council and the applicant agree that this provision is appropriate.</u></p> <p><u>If it can be demonstrated to the City Council that the full financial contribution, or equivalent on-site provision, would make the development unviable, the City Council will accept a lower financial contribution, in accordance with Appendix 4 (paragraph 6).</u></p> <p><u>An exception to this requirement for delivering affordable housing will be made where:</u></p> <p><u>a) for any the proposal that is within an existing university academic campus or college academic site*or hospital and research site that includes regular teaching activities and facilities as a main</u></p>
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	<p>Glossary</p>	<p><u>use as defined in the glossary; or</u></p> <p><u>b) the proposal is for an increase in student rooms within an existing student accommodation site, and this increase is shown to directly replace a net loss of student rooms on another site by the same institution</u></p> <p><u>b) the site has been allocated by the City Council solely for student accommodation; or</u></p> <p><u>c) the proposal is for the redevelopment and/or intensification of a site, including proposals for the extension of a site on contiguous adjoining land, where the main existing use is student accommodation; or</u></p> <p><u>d) the proposed student accommodation is necessary to enable either university to achieve or maintain its 3,000 student numbers threshold referred to in Core Strategy policy CS25; or</u></p> <p><u>e) where the City Council agrees that site is not suitable for, nor capable of being made suitable for, general purpose housing.</u></p> <p>Developers may not circumvent this policy by artificially subdividing sites. For mixed-use developments of student accommodation with general housing or commercial floorspace, a pro-rata approach will be used to determine whether a contribution is required, and how much this should be.</p> <p><i>*this means sites that existed as a university or college academic site on the date at which the Sites and Housing Local Plan was adopted and continues to exist as such"</i></p> <p>Add new definition to Glossary:</p> <p><u>Self contained student accommodation:</u></p> <p><u>Self contained accommodation occupied by a student is likely to fall within Use Class C3 and as such would be subject to the requirements of Policies HP3 and HP4 of this Plan, but is not subject</u></p>
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		<i>to the requirements of Policies HP5 and HP6.</i>
MM7	Paragraph A2.45 Policy HP7 (Houses in Multiple Occupation)	Amend paragraph A2.45 to read: <i>From February 2012, the City Council is able to grant or refuse planning permission for any proposed HMO.¹ The City Council will use its planning responsibilities to prevent any further over-concentration of HMOs in areas where there are already significant numbers. <u>The City Council considers that more than 20% of buildings in HMO use within a 200 metres' length of street is likely to result in over-concentration, although other site-specific considerations may be material.</u></i> Amend part (a) of Policy HP7 to read: <i>"a. the proportion of buildings used in full or part as an HMO* within 100 metres of street length either side of the application site does not exceed 20%, <u>unless the City Council agrees to make an exception based on other site-specific considerations, and"</u></i>
MM8	Paragraph A2.51	Amend paragraph A2.51 to read: <i>"The City Council recognises that there is demand for new residential moorings in Oxford, and will <u>work with boaters, landowners, navigation authorities and other interested parties to increase the supply of residential moorings in the City.</u> In principle support the creation of new residential moorings in appropriate off-river basins. There is limited mooring space suitable for permanent moorings in Oxford and also a need to balance permanent residential moorings with short-stay visitor moorings, which have an important role in promoting tourism in the city. In exceptional circumstances the Inland Navigation Authorities and the City Council may agree consider that it is appropriate for residential moorings to be located outside of off-channel basins. Such <u>New residential moorings must not conflict with British Waterways the Canal & River Trust's or the Environment Agency's operational requirements or interfere with</u></i>

¹ Note that, under the terms of the Article 4 Direction on HMOs, any Class C4 HMO can revert back to being a single Class C3 dwelling without the need to apply for planning permission.

	<p>Policy HP8 (Homes for Boat Dwellers)</p>	<p><i>navigational safety. –or be on the main Thames river channel. They must also comply with parts b-e of Policy HP8.</i></p> <p>Amend Policy HP8 part a to read: <i>"a. if located on the main river Thames they are provided in off-channel basins, and"</i></p> <p>Insert new part b into Policy HP8, renumber subsequent criteria c-f and amend as follows: <i>"b. if located on the Oxford Canal or other waterway they do not interfere with navigational safety or operational requirements, and"</i></p> <p><i>"b. c. there is adequate servicing including water supply, electricity, and disposal facilities for sewage and rubbish, and"</i></p> <p><i>"d. e. there is adequate access for emergency services vehicles, and"</i></p> <p><i>"e. f. There will be no significant adverse effect on..."</i></p>
<p>MM9</p>	<p>New sub-section after Policy HP8, p23</p>	<p><u>"Homes for Travelling Communities</u></p> <p><u><i>A2.54 The Oxford Core Strategy sets out the City Council's approach to planning for gypsies, travellers and travelling showpeople's accommodation needs. Core Strategy Policy CS26 Accommodation for Travelling Communities is a positive policy that sets out criteria for assessing suitable sites in Oxford. The Core Strategy also states that the City Council will work with other local authorities to provide additional sites and pitches in Oxfordshire, including consideration of suitable sites in the Site Allocations, if needed.</i></u></p> <p><u><i>A2.55 The City Council has considered evidence of need for traveller sites as part of the preparation of the Sites and Housing Plan. Overall, there is considered to be insufficient need, or evidence of deliverability, to justify a site allocation specifically for traveller accommodation. Regard has been had to the following:</i></u></p> <ul style="list-style-type: none"> ▪ <u><i>Bi-annual Caravan Counts: There has been 1 illegally sited caravan recorded, on one occasion, in Oxford in the five year period January 2007 – January 2012. This compares with 25 caravans located on unauthorised sites across Oxfordshire in the last year.</i></u>

		<ul style="list-style-type: none"> ▪ <u>Gypsy and Traveller Accommodation Assessment (GTAA)¹³: A Thames Valley GTAA indicated a need for 57 Gypsy and Traveller pitches in Oxfordshire, 5 of which related to need in Oxford. A joint Oxfordshire critical benchmarking of evidence in the GTAA led to a revised estimate of need of 42 pitches (for the period 2006-16), of which none related to need in Oxford.</u> ▪ <u>Travelling Showpeople Accommodation Assessment (TSAA)¹⁴: An Oxfordshire TSAA indicated a need for 34 Travelling Showpeople plots, 3 of which related to need in Oxford.</u> ▪ <u>Site Allocations Call for Sites: As part of the early preparation of the Sites and Housing Plan, a Call for Sites proforma was sent to 112 landowners, developers and planning agents, specifically asking whether sites were considered suitable for Gypsy and Traveller pitch development. Of over 50 sites put forward, none indicated an interest in providing traveller pitches.</u> <p><u>A2.56 Part B of this document sets out site allocations for residential development, which may include traveller pitch provision, provided that the criteria set out in Core Strategy Policy CS26 and other relevant local plan policies are met. Any site proposed for traveller accommodation that is not allocated will similarly be considered against Policy CS26.</u></p> <p><u>A2.57 The City Council is working with neighbouring local authorities to produce a new Traveller Accommodation Assessment. The outcome of this will be a material consideration in assessing proposals for traveller sites.</u></p> <p>¹³ <u>Gypsy and Traveller Accommodation Needs Assessment for the Thames Valley Region (Tribal Consulting, 2006)</u></p> <p>¹⁴ <u>Oxfordshire Needs Assessment for Travelling Showpeople (Tribal Consulting, 2008)</u>"</p>
<p>MM10</p>	<p>Paragraph A3.2</p>	<p>Amend first part of paragraph to read: <u>"At a local level, quality of life is greatly dependent on the home environment. Core Strategy Policy CS18 emphasises that development should respect and draw inspiration from Oxford's unique historic environment (above and below ground), and</u></p>

	<p>Policy HP9 (Design, Character and Context) and</p> <p>Table following</p>	<p><i>should respond appropriately to its surroundings, and be adaptable, providing for future alternative uses. Further evidence relating to the historic environment will be provided in the Heritage Plan."</i></p> <p>Amend paragraph A3.5 to read:</p> <p>A3.5 <u>Building for Life 12^{FOOTNOTE}</u> is a useful tool for local authorities and developers to assess the design quality of new housing developments. The criteria cover four<u>three</u> categories: <u>Environment and Community</u>; <u>Character</u>; <u>Streets, Parking and Pedestrianisation</u>, and <u>Design and Consultation</u> 'Integrating into the neighbourhood', 'Creating a place', and 'Street & Home'. New housing developments are scored <u>assessed</u> against a set of 20 <u>criteria to assess 12 questions on</u> the quality of their design. Good<u>High</u>-quality development will generally achieve a score of 14 or more (Silver Standard) <u>12 'greens' using a traffic light scoring system</u>. As the criteria in Building for Life include things such as street design, connectivity and communal space, Building for Life is generally more suitable for developments of 10 or more dwellings. All such developments in Oxford must demonstrate a score of at least 14 (Silver Standard), but should aspire to reach a score of 16 or more (Gold Standard) <u>should achieve 'green' for every aspect of Building for Life that applies to the development. Any aspect that does not achieve 'green' must be fully explained in the Design and Access Statement.</u></p> <p><small>FOOTNOTE</small> Detailed <u>Further guidance on how to apply Building for Life is found at www.designcouncil.org.uk/buildingforlife.</u></p> <p>Insert new criteria below part (a) of Policy HP9: <i>"b. <u>the development exploits opportunities to sustain and enhance the significance of significant heritage assets and their settings, and makes a positive contribution to local character and distinctiveness.</u>"</i></p> <p>Re-letter current parts b-g to become parts c-h.</p> <p>Amend part g (new part h) to read: <u>h. <i>developments of 10 or more dwellings must be assessed against all relevant Building for Life criteria, and achieve, as a minimum, a score of 14 (Silver Standard).</i></u></p> <p>Amend table following C1.7: HP9 implementation:</p>
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	C1.7 in respect of HP9	<p>• <i>For qualifying developments, Design & Access Statement to show how each Building for Life criterion has been considered in designing the development, and scored (the total score should be at least 14)</i></p> <p>Amend table following C1.7: HP9 target: <i>95% of new-build completions on sites of 10 or more homes should achieve 14 or above in the Building for Life assessment 'green' for every aspect of Building for Life that applies to the development.</i></p> <p>(Core Strategy Policy CS18 indicator)</p>
MM11	Paragraph A3.26 (Policy HP14 Privacy and Daylight)	<p>Amend last sentence in paragraph to read:</p> <p><i>"There should be at least 20 metres' distance between directly facing windows to habitable rooms in separate dwellings (this guideline will be applied flexibly where only student accommodation rooms are affected)."</i></p>
MM12	<p>Para B2.9 and Policy SP3 (Barton Road Cricket Ground)</p> <p>Para B2.13 and Policy SP4 (Bertie Place)</p> <p>Policy SP5 (Blackbird Leys Central Area)</p> <p>Para B2.21 and Policy SP7 (Canalside)</p> <p>Para B2.60 and SP23 (John Radcliffe Hospital Site)</p> <p>Para B2.68 and Policy SP25 (Land North of Littlemore Mental Health Centre)</p> <p>Para B2.71 and Policy SP26 (Land North of Roger Dudman)</p>	<p>Insert after paragraph B2.9, B2.13, B2.21 B2.71 B2.116:</p> <p><i><u>"Water supply capacity in this area is unlikely to be able to support the demand anticipated from this development. Investigations by Thames Water, funded by the applicant, will be necessary to determine whether an upgrade to the water infrastructure network is required. Up to three years lead in time could be required to undertake any such works."</u></i></p> <p>Insert at end of Policy SP3 SP4 SP7 SP26 SP49</p> <p><i><u>"Development must not lead to water supply network problems for existing or new users. Applicants may need to fund an assessment of water supply capacity."</u></i></p> <p>Insert after paragraph B2.60 B2.95 B2.97 B2.142:</p> <p><i><u>"Water supply and sewerage network capacity in this area are unlikely to be able to support the demand anticipated from this development. Investigations by Thames Water, funded by the applicant, will be necessary to determine whether an upgrade to the water infrastructure and sewerage network is required. Up to three years lead in time could be required to undertake any such works."</u></i></p> <p>Insert at end of Policy SP23 SP37 SP38 SP61:</p> <p><i><u>"Development must not lead to water supply and sewerage network problems for existing or new users. Applicants may need to fund an assessment"</u></i></p>

	<p>Policy SP34 (Nielsen)</p> <p>Para B2.95 and Policy SP37 (Northway Centre)</p> <p>Para B2.97 and Policy SP38 (Nuffield Orthopaedic Centre)</p> <p>Para B2.100 and Policy SP41 (Oxford Brookes University Gypsy Lane Campus)</p> <p>Para B2.114 and Policy SP48 (Radcliffe Observatory Quarter)</p> <p>Para B2.116 and Policy SP49 (Railway Lane)</p> <p>Para B2.120 and Policy SP51 (Ruskin College)</p> <p>Para B2.142 and Policy SP61 (Warneford Hospital)</p> <p>Policy SP65 (Wolvercote Paper Mill)</p>	<p><i>of water supply and sewerage capacity."</i></p> <p>Insert after paragraph B2.100 B2.120: <u>"Sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. Investigations by Thames Water, funded by the applicant, will be necessary to determine whether an upgrade to the sewerage network is required. Up to three years lead in time could be required to undertake any such works."</u></p> <p>Insert at end of Policy SP41 SP51: <u>"Development must not lead to sewerage network problems for existing or new users. Applicants may need to fund an assessment of sewerage capacity."</u></p> <p>Policy SP5, SP34, SP65 Replace: "Applicants will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users."</p> <p>with: <u>"Development must not lead to sewerage network problems for existing or new users. Applicants may need to fund an assessment of sewerage capacity."</u></p> <p>Delete paragraph B2.68 B2.114</p> <p>Delete from Policy SP25 SP48 "Applicants will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users."</p> <p>Delete from Policy "Applicants will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users."</p>
MM13	Policy SP4 (Bertie Place)	Add railway symbol to policy.
MM14	Paragraph B2.17 and	Amend paragraph B2.17 to read: <u>"This site is currently used as a depot which is due to be vacated. Two barracks buildings on the site are buildings of local interest possess heritage interest as one of the last historic references to the military heritage of Cowley. and eConsideration should be had given to incorporating them, and the stone wall, within the development. The impact of</u>

	<p>Policy SP6 (BT site)</p>	<p><u>development upon the existing barracks buildings and means of retaining or re-providing local interest should also be considered.</u> There are some important trees on site which should be retained. The site is suitable for both residential and student accommodation."</p> <p>Amend Policy SP6 to read: <i>"Planning permission will be granted for residential or student accommodation or a mix of both uses at the BT Site. Planning permission will not be granted for any other uses.</i></p> <p>The stone built barracks on site are buildings of local interest and should be retained. The stone boundary wall is an attractive feature of the site and should also be retained.</p> <p>Development should be designed to ensure that there is no adverse impact on the Lye Valley SSSI. To minimise impact upon the very sensitive Lye Valley SSSI, <u>Planning permission will only be granted if it can be proven that there would be no adverse impact upon surface and groundwater flow and the Lye Valley SSSI.</u> Development proposals should reduce surface water run off in the area and should be accompanied by an assessment of groundwater and surface water needed at design stage. <u>Development proposals must incorporate sustainable drainage with an acceptable management plan.</u> To ensure there is no adverse impact on the Brasenose Wood and Shotover Hill SSSI, an assessment should be made of recreational pressure and a plan made for mitigating any impact as a result of increased recreational pressures from the development."</p>
<p>MM15</p>	<p>Paragraph B2.19</p>	<p>Amend paragraph B2.19 to read: <i>"B2.19 A replacement boatyard is required to be provided to offset the loss of the boatyard previously on this site and to meet local need. Given the historic uses of the site, a replacement boatyard would be appropriate. The operating boatyard should <u>be of a size to include a wet dock, and allow craneage for narrowboats with possible supporting chandlery and associated workshop and DIY maintenance facilities.</u> Other uses that should be provided on the site are residential, a sustainably sized community centre, a public open space or square and <u>an new bridge improved crossing over the canal for pedestrians and cyclists.</u> The canal hire base at the northern part of the site should be retained."</i></p>

	and Policy SP7 (Canalside)	Amend Policy SP7 criteria "d" and "e" to read: <i>"d. replacement operating <u>appropriately sized boatyard</u></i> <i>e. an improved crossing over the Oxford Canal for pedestrians and cyclists."</i>
MM16	Policy SP8 (Churchill Hospital Site and Ambulance Resource Centre)	Amend last paragraph of Policy SP8 to read: <i>"Development should be designed to ensure that there is no adverse impact on the Lye Valley SSSI. To minimise impact upon the very sensitive Lye Valley SSSI, Planning permission will only be granted if it can be proven that there would be no adverse impact upon surface and groundwater flow and the Lye Valley SSSI. Development proposals should reduce surface water run off in the area and should be accompanied by an assessment of groundwater and surface water needed at design stage. Development proposals must incorporate sustainable drainage with an acceptable management plan. A buffer zone should be provided during the construction period to avoid disturbance to the SSSI."</i>
MM17	<p>Policy SP8 (Churchill Hospital and Ambulance Resource Centre)</p> <p>Policy SP23 (John Radcliffe Hospital Site)</p> <p>Policy SP38 (Nuffield Orthopaedic Centre)</p> <p>Policy SP39 (Old Road Campus)</p> <p>Policy SP42 (Oxford Business Park)</p> <p>Policy SP43 (Oxford Science Park at Littlemore)</p> <p>Policy SP44 (Oxford Science Park at Minchery Farm)</p>	<p>Amend the third paragraph of SP8, the fourth paragraph of SP23 to read: <i>Development proposals must not prejudice bus access through the site. Improvements to public transport access and the reduction in car parking provision on site will be required. <u>The development will be expected to minimise car parking spaces on site. Applicants will be expected to demonstrate how the development mitigates against traffic impacts and maximises access by alternative means of transport...</u></i></p> <p>Amend the second paragraph of SP38 to read: <i>Development proposals must not prejudice bus access through the site. The reduction in car parking provision on site will be required. The development will be <u>expected to minimise car parking spaces on site. Applicants will be expected to demonstrate how the development mitigates against traffic impacts and maximises access by alternative means of transport.</u></i></p> <p>Amend the third paragraph of SP48, SP51, SP60, SP61 the second paragraph of SP39 and SP43 and the first paragraph of SP42 and SP44 to read: to read: <i>...A reduction in car parking provision on site will be required. The development will be expected to <u>minimise car parking spaces on site. Applicants will be expected to demonstrate how the development mitigates against traffic impacts and maximises</u></i></p>

	<p>Policy SP48 (Radcliffe Observatory Quarter)</p> <p>Policy SP51 (Ruskin College Campus)</p> <p>Policy SP56 (Temple Cowley Pools)</p> <p>Policy SP58 (Travis Perkins)</p> <p>Policy SP60 (University of Oxford Science Area and Keble Road Triangle)</p> <p>Policy SP61 (Warneford Hospital)</p>	<p><u>access by alternative means of transport...</u></p> <p>Amend the second paragraph of SP56 to read: "A reduction in car parking provision on site will be required <u>The development will be expected to minimise car parking spaces on site. Applicants will be expected to demonstrate how the development mitigates against traffic impacts and maximises access by alternative means of transport. and a</u> Access should be retained through the site to the school."</p> <p>Amend the second paragraph of SP58 to read: A reduction in car parking provision on site will be required <u>The development will be expected to minimise car parking spaces on site. Applicants will be expected to demonstrate how the development mitigates against traffic impacts and maximises access by alternative means of transport. and p</u> Pedestrian and cycle links through and to the site should be</p>
<p>MM18</p>	<p>Paragraph B2.26 and</p>	<p>Amend Paragraph B2.26 to read: "There is potential to make better use of the site whilst respecting and improving the setting of the listed building. The existing graduate student accommodation should be replaced with new graduate accommodation or with self-contained residential accommodation which could be occupied by graduates or a mix of both uses. The site is not within an area that satisfies the student accommodation Policy HP5 so non-self contained student accommodation would not be suitable. Self contained graduate accommodation would be suitable. so there should be no net increase in students living on the site. Opportunities should be explored to open up footpaths for pedestrians through the site.</p> <p>More vulnerable development will be expected to be directed away from Flood Zone 3b. More vulnerable uses must not be developed within Flood Zone 3a unless the site specific Flood Risk Assessment demonstrates that the development will be safe, have a neutral impact on flood risk elsewhere and reduce flood risk overall. Part of the site is in Flood Zone 3b and Flood Zone 3a. However, the site has been sequentially tested as Flood Zone 2 as it is considered that the size,</p>

	Policy SP9 (Court Place Gardens)	<p><u>shape and location within the site of these areas mean that they do not need to be developed. A site specific flood risk appraisal will be required.</u></p> <p>Amend first paragraph of Policy SP9 to read: <i>"Planning permission will be granted for residential or a mix of both uses at Court Place Gardens. There should be no net increase in student accommodation units. Planning permission will not be granted for any other uses."</i></p>
MM19	Paragraph B2.32 (SP12 Cowley Marsh Depot)	<p>Amend paragraph to read: <i>"The site is suitable for residential or student accommodation or a mix of both uses. The main pedestrian access to any development of student accommodation should be from the southern west corner of the site onto Cowley Road to minimise students walking past residential properties."</i></p>
MM20	Paragraphs B2.36, B2.122 and B2.137 (Policy SP14 Diamond Place and Ewert House) (Policy SP52 St Clement's Car Park) (Policy SP59 Union Street Car Park)	<p>Amend paragraphs B2.36, B2.122 and B2.137 to read: <i>"...Sufficient car parking spaces should be retained at a level at which the City Council considers is reasonable to serve <u>and safeguard the vitality of the local area</u>, bearing in mind the quality of public transport to the area and the current level of usage of the car park..."</i></p> <p>Amend Policies SP14, SP52 and SP59 to read: <i>"...Sufficient <u>The number of car parking spaces should not be significantly reduced, but</u> be retained at a level at which the City Council considers is reasonable to serve the local area and provision must be made for <u>local temporary public car parking during construction...</u>"</i></p>
MM21	Paragraph B2.38- B2.39 and SP15	<p>Amend paragraphs B2.38 and B2.39 to read: <i>"B2.38 The <u>formal</u> allotments on <u>covering the whole of this site fell into disuse many years ago</u> with to the allotments feeling unsafe for users due to lack of overlooking. Since then the site has become quite overgrown but <u>recently there has been a renewed interest in food cultivation at this site and local people have been using part of the site</u> it for the <u>informal</u> communal growing of produce. An application would be required to the Secretary of State to remove the allotment designation on areas not proposed for this use.</i></p> <p><i>B2.39 The local community would like to be involved in delivering a communal open space on the site to allow for cultivation and to provide some open space for young people in the area. The City Council are keen to work with the community to explore opportunities <u>for communal growing areas or for retaining allotment space for local</u></i></p>

	<p>(SP15 East Minchery Farm Allotments)</p>	<p><u>people to manage. In order to strike a balance between the need for housing and the desire to retain some useful and safe public open space, it would be appropriate to develop part of the site for housing. This would improve overlooking and the feeling of safety which would encourage more active use of the site. If the demand for land retained at this site for allotments ceases the land may alternatively be used for communal open space.</u>"</p> <p>Amend the first paragraph of Policy SP15 to read: <i>"Planning permission will be granted for residential development and public open space at East Minchery Farm Allotments. Planning permission will not be granted for any other uses. The communal public open space should cover at least 2510% of the gross site area and should include space suitable for young people, such as a Multi Use Games Area, in addition, 20% of the gross site area should be retained as allotments. The development should be designed to ensure active frontages face onto the open space."</i></p>
<p>MM22</p>	<p>Paragraph B2.48 (Policy SP19 Government Buildings Site)</p>	<p>Amend paragraph to read: <i>"B2.48 The site is adjacent to student accommodation in John Garne Way and opposite academic uses of the Oxford Centre for Islamic Studies (OCIS). The pedestrian <u>route</u> and eyelet way of Cuckoo Lane along the edge of the site is rural in character enclosed by mature vegetation and should be retained as a green route <u>and which should be wide enough to support its role as a wildlife corridor</u>. The site is adjacent to the Headington Hill and the St Clements and Iffley Road Conservation Areas. There is a high potential for archaeological interest as the site is near identified Civil War defences and the Fairfax siege line."</i></p>
<p>MM23</p>	<p>Paragraph B2.54</p>	<p>Amend paragraph B2.54 to read: <i>"There may be scope for small-scale wind turbines to be located here, subject to consultation with the Ministry of Defence, and care would be needed in siting them to ensure there is no shadow flickering over the sports pitches. Renewable energy projects may be suitable, subject to tests in national planning guidance which would include the wider environmental benefits associated with increased production of energy from renewable sources. Essential facilities for outdoor sport and outdoor recreation are acceptable uses in principle within the Green Belt but any such development will be considered against national planning guidance for Green</i></p>

	<p>(Policy SP21 Horspath Site)</p>	<p><i>Belts. Built development other than essential facilities should will be directed to the area which is not within the Green Belt."</i></p> <p>Amend Policy SP21 to read: <i>"Planning permission will be granted for outdoor sports and social facilities and associated indoor club facilities and wind turbines at the Horspath Site. In addition, cemetery use may also be suitable on part of the site subject to remediation and mitigation measures. Planning permission will not be granted for any other uses.</i></p> <p><i>Any built development associated with the sports and club uses should will be located on the area which is not Green Belt unless it is an essential facility for outdoor sport and that it can be demonstrated that it preserves the openness of the Green Belt and does not conflict with the purposes of including land in it as set out in national planning guidance."</i></p>
<p>MM24</p>	<p>Paragraph B2.57</p> <p>(Policy SP23 John Radcliffe Hospital Site)</p>	<p>Amend paragraph to read: <i>"B2.57 The Oxford University Hospitals NHS Trust is confident that their future operational requirements can be met on the site through redevelopment and by making more efficient use of land. Some areas of the site will no longer be required by the Trust and will become available for alternative uses. <u>Proposals must consider their impact upon on the Old Headington conservation area. Any development would need to ensure that there was no adverse impact upon the setting of the listed buildings and Old Headington conservation area, to which the open space and trees on the site make an important contribution. Any such harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. The pedestrian and cycle way of Cuckoo Lane along the southern edge of the site is enclosed by mature vegetation and should be retained as a green route.</u></i></p> <p>Amend Policy SP23 to read: <i>"Careful design must ensure that development proposals contribute towards the character of the conservation area and preserve and enhance nearby listed buildings and their setting."</i></p>
<p>MM25</p>	<p>Policy SP25 (Land north of Littlemore Mental Health centre)</p>	<p>Amend the first paragraph of Policy SP25 to read: <i>"Planning permission will be granted for residential development at Land North of Littlemore Mental Health Centre. A minimum of 0.5 hectares (or approximately 25 dwellings) should be developed for key worker housing which could be provided as</i></p>

		<i>market housing or affordable housing, as defined. If the key worker housing is provided as affordable housing, as defined in the glossary, it will contribute towards the general provision of 50% affordable housing on the site. Planning permission will not be granted for any other uses."</i>
MM26	<p>Paragraph B2.73</p> <p>Policy SP27 (Lincoln College Sports Ground)</p>	<p>Amend paragraph B2.73 to read: <i>"...A cricket pitch must be retained unless an alternative site is found provision is made..."</i></p> <p>Amend the second and third paragraphs of Policy SP27 to read: <i>"The cricket pitch must be retained on the open space unless an alternative suitable provision site is found made. If an alternative provision site is found made the City Council must be satisfied that it will be delivered. The Lincoln College Sports Ground site will still be expected to provide 10% new public open space as part of the residential development.</i></p> <p><i>Development should not have an adverse impact upon the setting of Bartlemas Conservation Area</i> <i>Careful design must ensure that development proposals contribute towards the character of the Bartlemas Conservation Area and preserve and enhance nearby listed buildings and their setting.</i> <i>Development proposals and should encourage active frontages onto Barracks Lane and the new public open space. Development should be designed to ensure that there is no adverse impact on the Lye Valley SSSI."</i></p>
MM27	<p>Table following B1.5 Paragraphs B2.80-B2.81 (SP30 Longlands)</p> <p>Policy SP30 (Longlands)</p> <p>Paragraphs B2.83-B2.84 (SP32 Marston Court)</p> <p>Policy SP32 (Marston Court)</p> <p>Paragraphs B2.90-B2.91 (SP35 Northfield)</p>	<p>Amend text to read: <i>"B2.80 B2.132 B2.83 This site is currently a care home for the elderly. Oxfordshire County Council are continually reviewing their provision of care accommodation and this site could be suitable for the delivery of care accommodation. elderly person care and their strategy is to provide extra care housing on larger sites. However, it may not be possible to find suitable larger sites and therefore these sites should not be lost to other uses until the County Council has met all its need for extra care housing across Oxford.</i></p> <p>Amend text to read: <i>"B2.90 This site is currently accommodation for pupils at Northfield School (SP36). Oxfordshire County Council are continually reviewing their provision of care accommodation and this site could be suitable for the delivery of care</i></p>

	<p>Hostel)</p> <p>Policy SP35 (Northfield Hostel)</p> <p>Paragraphs B2.92-B2.93 (SP36 Northfield School)</p> <p>Policy SP36 (Northfield School)</p> <p>Paragraphs B2.132-B2.133 (SP57 Townsend House)</p> <p>Policy SP57 (Townsend House)</p>	<p>accommodation. elderly person care and their strategy is to provide extra care housing on larger sites. However, it may not be possible to find suitable larger sites and therefore these sites should not be lost to other uses until the County Council has met all its need for extra care housing across Oxford."</p> <p>Amend para B2.81, B2.133, B2.91 <u>If the County Council find adequate alternative sites in Oxford for their need for</u></p> <p>extra care accommodation then this site should be used for a replacement care home or residential. This site would also be suitable for residential."</p> <p>Amend para B2.84 <u>If the County Council find adequate alternative sites in Oxford for their need for</u></p> <p>extra care accommodation then this site should be used for a replacement care home or residential. This site would also be suitable for residential and student accommodation."</p> <p>Amend text to read: <u>"B2.92 This site is currently occupied by Northfield Special School. Oxfordshire County Council would like to relocate the school elsewhere in Oxfordshire. However, Oxfordshire County Council have indicated that there could be a need for a new school within this area to serve other new residential development, and rising pupil numbers in the state public sector generally, so it would be counter productive to lose the school site to an alternative use if it may be required to meet future needs. There may be a number of options available to the County Council in providing new school places in the local area therefore this site could be suitable for either education, residential and/or care accommodation.</u></p> <p><u>Under the terms of the Education Act 2011 all community school sites which have been used for education purposes in the previous 8 years have to be considered for general education purposes prior to any disposal in the future. The Secretary of State would need to give specific consent to dispose sites in each case and would consider the suitability of such land for use by an existing or potential academy. This provides some added protection for the Northfield School site to be retained in education use if required.</u></p>
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		<p><i>B2.93 Oxfordshire County Council are reviewing their provision of <u>care accommodation and special education sites and should the need be demonstrated this site could be suitable for special education, education or residential, including care accommodation.</u> elderly person care and their strategy is to provide extra care housing on large sites. However, it may not be possible to find suitable larger sites and therefore these sites should not be lost to other uses until the County Council has met its need for extra care housing across Oxford. More vulnerable development will be expected to be directed away from Flood Zone 3b. More vulnerable uses must not be developed within Flood Zone 3a unless the site specific Flood Risk Assessment demonstrates that the development will be safe, have a neutral impact on flood risk elsewhere and reduce flood risk overall.</i></p> <p>Amend policy SP57 SP35 and SP30 to read: <i>"Planning permission will be granted for extra care housing or a care home <u>care accommodation and/or residential</u></i></p> <p><i>If Oxfordshire County Council can demonstrate that there is no unmet need for extra care accommodation then this site would be suitable for residential. Planning permission will not be granted for any other uses..."</i></p> <p>Amend policy SP32 to read: <i>"Planning permission will be granted for extra care housing or a care home <u>care accommodation, residential, student accommodation or a mix of these uses at Marston Court</u></i></p> <p><i>If Oxfordshire County Council can demonstrate that there is no unmet need for extra care accommodation then this site would be suitable for residential or student accommodation. Planning permission will not be granted for any other uses...</i></p> <p>Amend policy SP36 to read: <i>"Planning permission will be granted for new development at Northfield School applying the following cascade:</i></p> <ol style="list-style-type: none"> <i>1. <u>Special eEducation</u>; and provided that it is not anticipated to be required for <u>special education OR</u> educational purposes during the plan period:</i> <i>2. <u>Care accommodation and/or residential</u> Extra care housing; and provided Oxfordshire County Council can demonstrate that there is no unmet need for extra</i>
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		<p>care accommodation:</p> <p>3. Residential:</p> <p>Planning permission will not be granted for any other uses. Regard should be had for any regeneration plan for the Blackbird Leys area which may include improving vehicular access from Knights Road through the site to the Kassam Stadium area. Development should not have an adverse impact upon the SLINC."</p>
MM28	<p>Policy SP31, Paragraphs B2.82 and text box Map of Page 53 Policies Map</p> <p>(Manor Ground)</p>	<p>Delete policy SP31, paragraphs B2.82 text box and reference in Appendix 9.</p> <p>Delete SP31 Manor Ground site from the Policies Map.</p> <p>Delete SP31 Manor Ground site from the Map on page 53</p>
MM29	<p>Policy SP33 (Marywood House)</p>	<p>Amend the second paragraph of Policy SP33 to read:</p> <p>"Development should be designed to ensure that there is no adverse impact on the Lye Valley SSSI. To minimise impact upon the very sensitive Lye Valley SSSI, Planning permission will only be granted if it can be proven that there would be no adverse impact upon surface and groundwater flow and the Lye Valley SSSI. dDevelopment proposals should reduce surface water run off in the area and should be accompanied by an assessment of groundwater and surface water needed at design stage. Development proposals must incorporate sustainable drainage with an acceptable management plan. To ensure there is no adverse impact on the Brasenose Wood and Shotover Hill SSSI, an assessment should be made of recreational pressure and a plan made for mitigating any impact as a result of increased recreational pressures from the development."</p>
MM30	<p>Para B2.87 (SP34 Nielsen)</p> <p>Policy SP34 (Nielsen)</p>	<p>Add to the end of paragraph B2.87: "<u>The former playing field should be relocated or facilities improved elsewhere.</u>"</p> <p>Add to the end of Policy SP34: "<u>The playing field should be re-provided or a contribution made to another facility.</u>"</p>
MM31	<p>Policy SP38 (Nuffield Orthopaedic Centre)</p>	<p>Amend the second paragraph of Policy SP38 to read:</p> <p>"Development should be designed to ensure that there is no adverse impact on the Lye Valley SSSI. To minimise impact upon the very sensitive Lye Valley SSSI, Planning permission will only be granted if it can be proven that there would be no adverse impact upon surface and groundwater flow and the Lye Valley SSSI. dDevelopment proposals</p>

		<p>and the Park Hospital site (SP46).</p> <p>Development should be designed to ensure that there is no adverse impact on the Lye Valley SSSI. To minimise impact upon the very sensitive Lye Valley SSSI, Planning permission will only be granted if it can be proven that there would be no adverse impact upon surface and groundwater flow and the Lye Valley SSSI. Development proposals should reduce surface water run off in the area and should be accompanied by an assessment of groundwater and surface water needed at design stage. Development proposals must incorporate sustainable drainage with an acceptable management plan."</p>
	Policies Map	Show the SP39 Old Road Campus site and SP46 Park Hospital site combined as one single site on the Policies Map.
	Map on Page 53	Show the SP39 Old Road Campus site and SP46 Park Hospital site combined as one single site on the map on page 53.
	Appendix 9	Delete Policy SP46, site facts box, paragraphs B2.109-B2.110, and reference in Appendix 9
MM33		Not Recommended.
MM34	Policy SP47 (Paul Kent Hall)	<p>Amend the second paragraph of Policy SP47 to read:</p> <p>"Pedestrian and cycle links should be improved through and to the site. Development should be designed to ensure that there is no adverse impact on the Lye Valley SSSI. To minimise impact upon the very sensitive Lye Valley SSSI, Planning permission will only be granted if it can be proven that there would be no adverse impact upon surface and groundwater flow and the Lye Valley SSSI. Development proposals should reduce surface water run off in the area and should be accompanied by an assessment of groundwater and surface water needed at design stage. Development proposals must incorporate sustainable drainage with an acceptable management plan."</p>
MM35	Policy SP50 (Rover Sports and Social Club)	<p>Amend Policy SP50 to read:</p> <p>"Planning permission will be granted for car manufacturing at Rover Sports and Social Club site. Planning permission will not be granted for any other uses. The All outdoor sports fields and associated indoor social facilities currently on the site must be re-provided elsewhere in the locality."</p>
MM36	Paragraph	Amend Paragraph B2.126 to read:

	B2.126 Policy SP53 (St Cross College Annex SP53)	<p><i>"B2.126 In order to minimise traffic movements, the most appropriate uses for the site are either student accommodation or car free residential. The former <u>tennis facility has been adequately re-provided. playing field should be relocated or facilities improved elsewhere.</u>"</i></p> <p>Amend the final sentence of Policy SP53: <i>"A planning application must be accompanied by a site specific flood risk assessment and development should incorporate any necessary mitigation measures. <u>The playing field should be reprovided or a contribution made to another facility.</u>"</i></p>
MM37	Policy SP55 (Summertown House)	<p>Amend first paragraph of Policy SP55 to read: <i>"Planning permission will be granted for <u>graduate or student accommodation at Summertown House. Planning permission will not be granted for any other uses.</u>"</i></p>
MM38	Policy SP61 (Warneford Hospital)	<p>Amend Policy SP61 to read: <i>"Development should be designed to ensure that there is no adverse impact on the Lye Valley SSSI. <u>To minimise impact upon the very sensitive Lye Valley SSSI, planning permission will only be granted if it can be proven that there would be no adverse impact upon surface and groundwater flow and the Lye Valley SSSI. Development proposals should reduce surface water run off in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan.</u>"</i></p>
MM39	Paragraph B2.144 Policy SP62 (Warren Crescent)	<p>Amend paragraph B2.144 to read: <i>"B2.144 <u>The nearby Lye Valley SSSI is very sensitive to changes in surface water runoff and ground water flows. as it is in poor condition. Increased hard standing in close proximity to the SSSI could have an adverse impact upon surface and ground water flows and it will be necessary for a surface and groundwater study to be undertaken as concluded in the Source Pathway Receptor Analysis. Should the study indicate that residential development will have an adverse impact upon the SSSI, planning permission will not be granted. Any development will require sustainable drainage with an acceptable management plan.</u>"</i></p> <p>Amend Policy SP62 to read: <i>"Planning permission will only be granted for residential development at Warren Crescent if it can be</i></p>

		<p><u>Non-self contained graduate accommodation is likely to fall within Sui Generis use and would be subject to the requirements of Policy HP5 and HP6 and not HP3 and HP4.</u></p> <p><u>Self contained graduate accommodation would count towards the University's provision of student accommodation in relation to Core Strategy Policy CS25 for as long as the accommodation remains occupied by graduates of the relevant university."</u></p>
MM42	Glossary	<p>Amend definition: " Student accommodation <i>Accommodation whose main purpose is to house students of 16 years or above, registered on full-time courses of an academic year or more in Oxford, and is not self-contained for each tenant."</i></p>
MM43	Appendix 8	<p>Amend fifth paragraph (titled: <i>Larger housing developments outside the Transport Central Area</i>) to read:</p> <p><i>"Planning permission for proposals that involve the creation of a new vehicular access (including parking courts) will only be granted where some parking provision is provided as unallocated spaces. For developments outside all CPZs, the City Council will encourage all dwellings should to have at least 1 allocated parking space. The maximum standards for allocated and unallocated parking are shown below."</i></p>
MM44	Appendix 8	<p>Make following insertions to parking standards under '<u>Other residential development within and outside the Transport Central Area</u>'</p> <p>HMO (Sui Generis) (outside TCA) 1 space per 2 habitable rooms HMO (Sui Generis) (within TCA) 1 space per HMO dwelling</p>
MM45	Appendix 10	<p>Update the data within new Appendix 10 with latest SHLAA information. Latest information currently contained within the draft of SHLAA (Dec 2012) which may be refined prior to adoption.</p>
MN46	<p>Policy SP1 (Avis)</p> <p>Policy SP9 (Court Place Gardens)</p> <p>Policy SP10 (Cowley Centre)</p>	<p>Insert new paragraph at end of policy SP1: <u>"Development should not have an adverse impact upon the setting of the Osney Town conservation area."</u></p> <p>Insert new paragraph at end of policy SP9: <u>"Development should not have an adverse impact upon the setting of the Iffley Conservation Area."</u></p> <p>Insert new paragraph at end of policy SP10:</p>

		<u>"Development should not have an adverse impact upon the setting of the Beauchamp Conservation Area."</u>
	Policy SP13 (Crescent Hall)	Insert new paragraph at end of policy SP13: <u>"Development should not have an adverse impact upon the setting of the Temple Cowley conservation area."</u>
	Policy SP41 (Oxford Brookes University Gipsy Lane Campus)	Insert new paragraph at end of policy SP41: <u>"Careful design must ensure that development proposals contribute towards the character of the conservation area."</u>
	Policy SP44 (Oxford Science Park at Minchery Farm)	Add the following sentence to the end of Policy SP44: <u>"Careful design must ensure that development proposals preserve and enhance the Grade II* listed Minchery Farmhouse and its setting."</u>
	Policy SP 49 (Railway Lane)	Insert new paragraph at end of policy SP49: <u>"Development should not have an adverse impact upon the setting of the Littlemore conservation area."</u>
	Policy SP51 (Ruskin College Campus)	Amend the 1 st sentence of the second paragraph of Policy SP51 to read: <u>"Development must retain and enhance the listed building and wall and their setting."</u>
	Policy SP54 (South Parks Depot)	Amend the 1 st sentence of the second paragraph of Policy SP54 to read: <u>"Development must retain and enhance the listed barn and wall and their setting."</u>
	Policy SP55 (Summertown House)	Amend the 2 nd paragraph of Policy SP55 to read: "Through further development on the site it must be demonstrated that the new design will have a positive effect on the setting of the listed building compared to the existing development." <u>Development must retain and enhance the listed building and its setting."</u>
	Policy SP56 (Temple Cowley Pools)	Insert new paragraph at end of policy SP56: <u>Development should not have an adverse impact upon the setting of the Temple Cowley conservation area."</u>
	SP61 (Warneford Hospital)	Amend the second sentence of the second paragraph of Policy SP61 to read: <u>'Development must retain and enhance the listed buildings and their setting.'</u> Insert new paragraph at end of policy SP61:

		<i><u>"Development should not have an adverse impact upon the setting of the Headington Hill conservation area."</u></i>
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