

Oxford Local Plan 2036

Inspectors' initial questions and comments: Set 2

Our first set of questions, issued on 29 May 2019, focused on broad policy issues. We have now received the Council's first set of responses to these questions and we will be commenting on them in due course.

This is our second set of questions and comments; these concentrate on more specific policy and site issues. We would be grateful for the Council's response to the questions and where policy changes are indicated in our comments we would ask the Council to respond with appropriate wording.

1. Policy H3: Employer-linked affordable housing

Is it necessary for the Council to exert the degree of control over employer-linked affordable housing set out in Policy H3? In particular, is it necessary for the policy to require Council approval for the list of items in subsection (a) (d) (e) (f) (g) and (h) bearing in mind that the organisations concerned will have their own on-site operational requirements, their own staffing requirements and their own appropriate tenancy arrangements tailored to their needs?

What are the planning reasons that justify such an approach given that the sites are presumably suitable for housing in any event?

2. Policy H8: Provision of new student accommodation

Criterion (b) raises the same concerns as set in Question 7 of our first set of questions: as regards student accommodation, it prefers students of certain institutions over others. This organisation/occupier-based approach rather than land use based approach does not appear to have any foundation in national planning policy and has the potential to raise equalities issues. The Council are invited to comment.

What is the reason for the strict locational criteria in the first part of the policy? Would these rule out other suitable locations and therefore impose an unnecessary restriction on the development of much needed purpose-built student accommodation in the city, thus increasing the pressure on the family housing stock?

Please can the Council explain how it would be capable of enforcing against breaches of criteria (a) and (b) given the typical fluidity and transitory nature of student occupation? Also, in the case of criterion (e), please can it explain how students parking cars elsewhere could be enforced against, and what the Council would do if the developer did not do this? Our initial view is that these clauses may be unenforceable in practice. The Council are invited to comment.

3. Policy H10: Accessible and adaptable homes

The latter part of the policy, which concerns M4(3) standards, would appear to place a disproportionate burden on smaller sites. On larger sites, 5% of the dwellings are required to be provided to M4(3) standards but on (say) a site of 4 dwellings the proportion would be 25%. This would not appear to be justified on the evidence, would place a greater burden on smaller site developers which would work against the national policy objective of promoting the development of smaller housing sites, and would thus appear inequitable. To overcome these issues the threshold should need to be set at a point where 5% would yield one dwelling: this would indicate that the policy should state "on sites of 20 or more dwellings".

4. Policy H15: Internal space standards

Has the Council gathered evidence to determine whether there is a need for these additional standards in the city?

Is it appropriate to use the standards for bedrooms in new-build HMOs, extra care housing and student accommodation given the clear statements in Paragraph 2 of "Technical housing standards – nationally described space standard" that the requirements for bedrooms are relevant in determining compliance with the standard in new dwellings and have no other use, and paragraph 7 states that minimum floor areas for bedrooms cannot be used in isolation from other parts of the design standard. The Council are invited to comment.

5. Policy RE3: Flood risk management

We note the contents of the Statement of Common Ground with the Environment Agency and do not need to pick up individual points under the site specific policies. However, please can the Council comment as to whether it considers the measures proposed in the Statement of Common Ground are likely to affect the anticipated capacity of the affected housing sites.

6. Policy RE4: Sustainable drainage, surface and groundwater flow

As regards details of the SuDS, the policy cannot require compliance with a separate document that is not part of the development plan and has thus not been subject to examination. The text should instead read "Applicants must have regard to.."

7. Policy RE5: Health, Wellbeing and Health Impact Assessments

What might an HIA include that is not already in the other submitted material including the design and access statement? In what circumstances can the

Council envisage it would make use of the information in an HIA to refuse or seek amendments to a development?

8. Policy RE6: Air quality

In the fourth paragraph, the text should read "which in the absence of mitigation measures would be likely to expose.."

9. Policy RE7: Managing the impact of development

Criterion (b) refers to "unaddressed transport issues" and criterion (g) seeks transport evidence, but Policy RE7 does not set out how the local planning authority would judge the acceptability of the transport aspects of a scheme. This needs to be clarified for effectiveness. The same problem arises in Policy M2, which is referred to below. When dealing with planning applications, all parties need to know the yardsticks by which the application will be judged. We note the suggested revised wording from the Statement of Common Ground with Highways England, but this policy and Policy M2 need to be developed and we invite the Council to re-write the relevant aspects of both policies, employing the wording from NPPF paragraphs 109 and 110.

10. Policy G2: Protection of biodiversity and geodiversity

We note that the Statement of Common Ground with Natural England indicates that an appropriate assessment will be required in respect of certain potential impacts on the Oxford Meadows SAC, notwithstanding that there is already an HRA / AA. Please can the Council set out the current position.

Should the policy also refer to land immediately adjacent to SACs and SSSIs?

Where brownfield sites which have become vegetated are to be developed, would the requirement to demonstrate a net gain in biodiversity of this order make it more difficult to make full use of brownfield land, thus running counter to important planning objectives to make the best use of such land in this very constrained urban area?

11. Policy G3: Green Belt

"Save where provided for within this Local Plan" should be deleted, since the plan should not deviate from national Green Belt policy. If these words are referring to allocated sites removed from the Green Belt by the Plan, they are unnecessary: their removal through the plan process would accord with national policy and on the Plan's adoption they would not be in the Green Belt.

12. Policy G5: Outdoor sports

The policy does not reflect the contents of paragraph 97 of the NPPF which includes recreational buildings. The Council are invited to re-cast this policy to reflect national policy and cover indoor sports including leisure and indoor sports centres, pavilions, stadiums and clubhouses. These should be removed from paragraph 8.23 in relation to Policy V7 and brought under Policy G5, which should be re-worded to accord with the NPPF.

13. Policy G7: Other green and open spaces

If Policy G5 is amended to accord with NPPF paragraph 97 to cover sports and recreational open space and buildings, and given that Policy G1 protects the Green and Blue Infrastructure Network designated on the Proposals Map, it is not clear what Policy G7 is intended to achieve. It is not a Local Green Space policy allowed for by Paragraph 99 of the NPPF, because the land is not designated as such and there is no indication of community involvement. In applying exceptional circumstances and community benefit tests to development proposals for undefined open space, Policy G7 appears not to have any basis in national policy. We are minded to recommend the deletion of this policy in conjunction with the modification of Policy G5 as discussed above. The Council are invited to comment.

14. Paragraph 6.10 (Preamble to Policy DH1: High quality design and placemaking) and Appendix 6

The explanatory text states that, in relation to public art, "A developer will be expected to show how public art has been designed in at an early stage... Details of the public art should be submitted with a planning application" whilst Appendix 6 states "...public art.. should be provided on all schemes of 20 dwellings or more or over 2,000 square metres". These statements read as (and would be likely to be applied as) policy requirements, but they do not appear in Policy DH1 itself. Policy requirements should be set out within the policies rather than in the supporting text. However, the statements are inappropriate in any case because the NPPF does not seek public art in schemes of this size and above; rather, it seeks the creation of high quality buildings and spaces. Whilst public art might form an element of this, it is not an essential component of good design; the cost of commissioning art might be better spent on other design aspects. In consequence, the requirements in paragraph 6.10 and Appendix 6 are unnecessarily prescriptive and ineffective as written and should be deleted. It would instead be appropriate for the supporting text to express encouragement towards the provision of public art on larger development schemes. The bracketed part of the relevant bullet in Appendix 6 should be deleted.

15. Policy DH2: Views and building heights

In criterion (b), the text should read "... and regard should be had to the guidance on the design of higher buildings set out in the High Buildings Study TAN..", rather than the "TAN should be followed". That is because the TAN has not been subject to examination and is not part of the development plan, so compliance with it cannot be required by a local plan policy.

The main issue is whether the Plan is effective in controlling building heights to protect the city's character and its heritage assets and their settings and we invite the Council to provide a considered response to this in the light of the comments from Historic England.

16. Policy DH3: Designated heritage assets

Some changes are needed to this policy to bring it into line with national policy. Firstly, the contents of NPPF paragraph 194 should be included. Secondly, there should be references to listed building consent (note that the NPPF uses the word "consent"). Thirdly, in the latter part of this policy, criterion (i) should not conclude with "and", it should say "or if all of the following apply". These changes need to be made at minimum, but in fact to avoid subsequent arguments over policy interpretation (at public inquiry for example) we recommend that Policy DH3 is re-written to use precisely the words and structure of the relevant section of the NPPF.

We note that Historic England has commented that a number of site allocations should be deleted because it says that they would, for various reasons, have an adverse effect on heritage assets. Please can the Council provide a commentary on each of these. Is it intended to produce a statement of common ground with Historic England which addresses the way forward for these sites?

17. Policy DH4: Archaeological remains

To ensure that the policy complies with national planning policy the word "significance" should be added to lines 4/5 of the policy: "...define the character, extent and significance.." and the word "generally" should be removed from line 6.

18. Policy DH5: Local Heritage Assets

This policy actually relates to non-designated heritage assets, ie those not included in the definition in the glossary of the NPPF, and it should say clearly that this is what it is referring to. The first part of Policy DH5 does not belong in the policy since it is an explanation of the criteria the Council themselves will use in deciding what goes on the Oxford Heritage Asset Register; it is not a policy applicable to development management. It should be removed and put into the explanatory text. In the second part of the policy, the requirement to

demonstrate that the conservation of the asset has informed the design of the development is not in accordance with national policy. We invite the Council to revise the policy take into account the above, and to reflect the wording in paragraph 197 of the NPPF which requires a balanced judgement to be made in respect of applications affecting the significance of non-designated heritage assets, having regard to the scale of any harm or loss and the significance of the heritage asset.

19. Policy DH6: Shopfronts and signage

The terminology of the policy and the supporting text at paragraph 6.43 needs to be corrected. Advertisements do not require planning permission; they need advertisement consent. Supporting structures are considered part of the advertisement. Shopfronts however do require planning permission. So the policy should read "Advertisement consent will only be granted for signage, and planning permission will only be granted for shopfronts, where...".

20. Policy M1: Prioritising walking, cycling and public transport

The second paragraph of the policy should read: "Financial contributions fairly and reasonably related to the development will be sought towards the cost of new or improved bus services where the direct impact of development would make such measures necessary", to ensure that the policy accords with the statutory requirements for s106 obligations in the CIL Regulations and the policy requirements in paragraph 56 of the NPPF.

21. Policy M2: Assessing and managing development

Transport Assessments and Travel Plans are documents that are submitted with planning applications, but the policy does not establish any criteria to be used to assess whether a scheme is acceptable. The last sentence of this policy does not assist an applicant to understand what "adequate and appropriate transport-related measures" are, or when they would be required. This issue is linked to Policy RE7(g), referred to above, which has the same shortcomings. When dealing with planning applications, all parties need to know the yardsticks by which the application will be judged. Policy RE7(g) and Policy M2 need to be developed and the Council are invited to re-word the relevant parts employing the wording from NPPF paragraphs 109 and 110.

Construction Management Plans are referred to here and in the supporting text but without any detail. The policy needs to be clear about the circumstances under which a Construction Management Plan will need to be submitted. The contents of such a plan could be included in Appendix 7.

We note the Statement of Common Ground with Highways England.

22. Policy M3: Motor vehicle parking

Car free housing – Please can the Council provide the evidence which directly demonstrates that it is necessary to have car free housing in the circumstances set out in Policy M3 in order to protect the integrity of the Oxford Meadows SAC (see paragraph 7.24).

Is it the intention of the Council that by 2036 all new housing throughout the city will be car free? This would appear to be the case from paragraph 7.24, which states that Controlled Parking Zones will cover the whole city by 2036 if not earlier, and one reading of Policy M3, which requires car free housing within such zones. However, Policy M3 is ambiguous since it is not clear whether the walking distance criteria are separate from the CPZ requirement or whether they qualify it. What is the intention of the Council? The policy and supporting text need to be re-written to clarify this matter.

Have the Council looked into the practical implications of this policy? Is there any study which examines the potential effect of the car free housing policy on conditions in neighbouring streets, the availability of space in public car parks, and on parking in private car parks by agreement or for a fee?

Has the Council looked at the potential effects of its proposed car free policy on the profile of households that would occupy new housing: for example whether it would have the effect of limiting new housing opportunities within the city for different sectors of society; for example, whether it would reduce the likelihood of housing being occupied by families with children, less mobile people (but not registered disabled people who are catered for by the policy), and other groups in need of personal transport?

Parking standards – Paragraphs 5 and 6 of the policy are ambiguous. Paragraph 5 refers to no increase in parking, but what baseline is this related to? Is this talking about extensions / expansion of existing sites? Paragraph 6 talks about additional parking within new developments, but it is not clear what additional means – does it refer to provision above that allowed for in the parking standards?

Appendix 7.3 is also unclear. It has a zero parking requirement for “existing employment uses” which presumably means extensions to existing employment uses. For “all other uses” – presumably including extensions to them – it states that these are to be determined through discussion in the light of the Transport Assessment and Travel Plan. If this interpretation is correct, it appears inconsistent to adopt a different approach towards parking for extensions to existing employment sites compared with extensions to other uses. Similarly, it would appear inconsistent to adopt a different approach to parking for extensions on existing employment sites compared with parking on new employment sites. The Council’s response to Set 1 of our questions and comments does not address this point.

The appropriate approach in all cases would be evidence-based discussion in the light of the Transport Assessment and Travel Plan, subject to the overriding objective to limit parking to that necessary to ensure the effective operation of

the activity whilst ensuring that the City's environmental objectives are not compromised. We invite the Council to re-write these parts of the policy and the relevant part of Appendix 7 to reflect this.

The approach towards reducing parking on existing operational sites does not appear in this policy but is included in a number of the site specific policies. We have already commented on this approach in our first set of questions and will be replying to the Council's response in due course.

23. Policy M5: Cycle parking

What survey work has been carried out to support the cycle parking standards set out in Appendix 7.4?

Is it a mistake that Appendix 7.4 requires 4 cycle spaces for a 1 or 2 bedroom dwelling?

Oxford Brookes University states that 75% of the cycle parking spaces on its site are unused. Please can the Council point towards any practical survey work and discussions with the academic institutions that provides support for the standard of 3 cycles for 4 student bedrooms? Would this standard lead to an unnecessary amount of land being devoted to unused cycle parking?

24. Policy V1: Ensuring the vitality of centres

We have read the background justification for the retail impact assessment threshold, which makes reference to comparable-sized units, but has any analysis of potential trade draw or trade impact (as opposed to unit sizes) been carried out to support the threshold?

Should the policy make it clear that the plan's allocations are exempted from the need for a retail impact assessment?.

25. Policy V2: Shopping frontages in the city centre

Has any survey work and analysis been carried out to assess whether this degree of prescription and control over the proportion of retail uses is necessary or desirable, in the light of (a) changing retail patterns and (b) the impact of the Westgate Centre?

Is "the proportion of units" in line 5 of criterion (c) meant to say more (as it does in Policy V3)? – at the present time it is not clear.

Criterion (g) gives the Council the opportunity to decide arbitrarily what does and does not add to the diversity and range of uses available to shoppers and visitors, leading potentially to inconsistent approaches being taken to applications for development within the same use class. Prospective applicants would not be able to tell whether their proposal would be likely to meet with approval. In consequence the criterion is unclear and ineffective as it stands,

and it should instead be re-written to express encouragement to proposals that add to the diversity and range of uses.

26. Policy V3: The Covered Market

As with Policy V2, Criterion (i) gives the Council the opportunity to decide arbitrarily what does and does not add to the diversity and range of uses available to shoppers and visitors, leading potentially to inconsistent approaches being taken to different kinds of activity within the same use class. Prospective applicants would not be able to tell whether their proposal would be likely to meet with approval. In consequence the criterion is unclear and ineffective as it stands, and it should instead be re-written to express encouragement to proposals that add to the diversity and range of uses.

27. Policy V4: District and Local Centre Shopping Frontages

Please will the Council explain the reason for the differences in the percentage figures applied to the different shopping centres, including drawing attention to any relevant survey work.

Why isn't there an "exceptional circumstances" clause for the District Centres as there is for the other kinds of centre?

As with Policies V2 and V3, Criterion (p) gives the Council the opportunity to decide arbitrarily what does and does not add to the diversity and range of uses available to shoppers and visitors, leading potentially to inconsistent approaches being taken to different kinds of activity within the same use class. Prospective applicants would not be able to tell whether their proposal would be likely to meet with approval. In consequence the criterion is unclear and ineffective as it stands, and it should be re-written to express encouragement to proposals that add to the diversity and range of uses.

28. Policy V5: Sustainable tourism

Please can the Council highlight how this policy relates to any overall policy for the management of tourism.

It is not clear from the policy itself whether it applies to the expansion of existing accommodation as well as completely new visitor accommodation. Paragraph 8.15 supports the modernisation of existing sites, but this does not appear in the policy; "modernisation" in itself does not require planning permission, and does not mean the same as expansion. The approach to the development and expansion of existing sites should be made clear in the policy.

Given the very high demand for hotel accommodation, is there a good reason for the policy to be so restrictive in terms of its locational criteria and would it rule out appropriate sites? There are other policies in the plan which seek to protect

residential accommodation and living conditions, so is this locational restriction necessary?

Criterion (j) gives the Council the opportunity to decide arbitrarily what does and does not add to the cultural diversity of Oxford, leading potentially to inconsistent approaches being taken to different kinds of activity within the same use class. Prospective applicants would not be able to tell whether their proposal would be likely to meet with approval. In consequence the criterion is unclear and ineffective as it stands, and it should be re-written to express encouragement to proposals that add to the cultural diversity of Oxford.

29. Policy V6: Cultural and social activities

The use of "cultural" in both Policies V6 and V7 introduces some uncertainty as to the application of these policies and it would be better to address cultural uses in one or the other.

Criterion (d) gives the Council the opportunity to decide arbitrarily what does and does not add to the cultural diversity of Oxford, leading potentially to inconsistent approaches being taken to different kinds of activity within the same use class. Prospective applicants would not be able to tell whether their proposal would be likely to meet with approval. In consequence the criterion is unclear and ineffective as it stands, and it should be re-written to express encouragement to proposals that add to the cultural diversity of Oxford.

30. Policy V7: Infrastructure and cultural and community facilities

See Policy V6 above: the use of "cultural" in both Policy V6 and V7 introduces some uncertainty as to the application of these policies and it would be better to address cultural uses in one or the other.

Paragraph 8.23 sets out a list of these facilities. Under question 10 above, we have indicated that leisure and indoor sports centres, pavilions and stadiums, should be moved from this policy to Policy G5 which itself should be re-written to accord with the NPPF.

31: Policy V8: Utilities

In the second part of this policy it is not clear what the Council mean by "high quality digital facilities". The technological needs of users across the spectrum of B1 and B2 uses will vary widely and this policy does not give applicants or development management officers any clear idea of what is required to make a planning application acceptable. The provision of these facilities is best left to developers and prospective occupiers and we are minded to recommend deletion of this requirement. The Council are invited to comment.

We make the observation here that there are a number of inappropriate requirements relating to water and sewerage in the supporting text relating to

the site-specific policies, which contain a requirement for water supply and/or sewerage capacity to be investigated by Thames Water, such investigations to be funded by the applicant. An example is in paragraph 9.269 relating to Policy SP53: Oxford University Press Sports Ground, but there are a number of others, and we note that following Regulation 19 consultation, the Council are proposing similar wording in relation to most of the site policies. These requirements are inappropriate for various reasons. Firstly, the preparation of Local Plans is intended to be the focus for ensuring that the investment plans of water and sewerage companies align with development needs. It should not therefore be necessary for every allocated site to contain a requirement that planning applications have to fund exploratory investigations into water and sewerage needs; by this stage of the local plan process the capacity constraints, if any, should be known. Secondly, the issue is covered by other legislation: water companies themselves are subject to a statutory duty to 'effectually drain' their area. This requires them to invest in infrastructure suitable to meet the demands of projected population growth. There is also statutory provision for developers to fund the additional sewerage infrastructure required to accommodate flows from a proposed development. It is therefore unnecessary to include this in a local plan policy. Finally, s106 of the Town and Country Planning Act 1990 does not contain any provision for a Council to require a developer to pay a third party. This requirement should be deleted in its entirety and Council's similar proposed additions should not be made.

Site- and area-specific policies

We raised a number of general comments in respect of these policies in our first set of questions. These include, for example, requirements to reduce car parking on existing operational sites, and the use of the phrases "planning permission will not be granted for any other use" and "planning permission will only be granted for". We will not repeat those points here, but will return to them separately when we reply to the Council's response.

We do not consider it appropriate in a development plan to include the name of the landowner against each site. It is unnecessary for the purposes of the plan, and will become quickly out of date.

32. Policy SP1: Sites in the West End

The policy cannot say that planning permission will only be granted for new developments that follow the framework of the West End Design Code, since the latter is not part of the development plan and has not been subject to examination. It should therefore be re-written to say that development should have regard to the Code.

33. Areas of Change: Cowley Centre District Centre, East Oxford-Cowley Road District Centre, Summertown District Centre, Headington District Centre, Cowley Branch Line, Marston Road, Old Road

The Plan contains no numbered policies governing these areas. However, the background text contains a number of statements such as those in paragraphs 9.32, 9.42, 9.51, 9.58, 9.72, 9.78, 9.109 and 9.126 which are in fact policy requirements and are therefore inappropriately placed in the supporting text. As they stand these statements are ineffective. These should be set out in policy boxes, consistent with the remainder of the plan, beginning "Planning permission will be granted for new development within the area of change where it would take opportunities to deliver the following, where relevant.." or, alternatively, "Development proposals within the area of change, where relevant, should assist in achieving the following objectives..".

34. Policy SP17: Government Buildings and Harcourt House

What is the justification for restricting student accommodation to the part of the site north of Cuckoo Lane?

What is the justification for 10% public open space on the site given that it is near a park?

35. Policy SP 19: Land surrounding St Clement's Church

The policy would prevent Magdalen College from providing student accommodation on its own land. What are the planning reasons for this? What are the implications in terms of providing for student requirements?

36. Sites Released from the Green Belt (Policies SP24 to SP31)

This heading will need to be deleted for the adopted version of the plan, along with the statement in paragraph 9.145 that various sites "are in Green Belt currently". In the adopted version of the Plan such sites will not be in the Green Belt.

Whilst noting the last sentence of NPPF paragraph 138, please can the Council explain how in practical terms the developer of each of these sites is expected to make compensatory improvements to surrounding areas of Green Belt where these are not within their ownership?

Please will the Council set out the specific local level characteristics (as opposed to strategic level circumstances) that have led them to conclude that there are exceptional circumstances that justify the release of these particular sites from the Green Belt.

37. Policy SP34: Canalside Land

Does this policy with its prescriptive list of requirements contain enough flexibility to ensure delivery?

38. Policy SP39: Former Iffley Mead Playing Fields

In the light of the former use and more recent history of this site, is the requirement for compensatory playing field provision or a compensatory contribution justified and/or adequate?

39. Policy SP41: Jesus College Sports Ground

The policy would prevent Jesus College from providing student accommodation on its own land. In addition, the location of the site near to the district centre and transport routes could make it suitable for student accommodation. What are the planning reasons for preventing student accommodation from being provided? What are the implications in terms of meeting the need for student accommodation?

Are the provisions for compensatory sports facilities appropriate, having regard to any playing field study and strategy?

40. Policy SP42: John Radcliffe Hospital Site

A number of representations refer to the need for greater flexibility in the list of acceptable activities (ie planning permission not being granted for any other uses) and the issue of a reduction in car parking provision. These issues were covered in general terms in our first set of questions and comments, to which the Council have now replied. The issues raise practical concerns in respect of sites such as this and we will be responding to the Council in due course.

41. Policy SP44: Lincoln College Sports Ground

The policy would prevent Lincoln College from providing student accommodation on its own land. What are the planning reasons for preventing student accommodation from being provided? What are the implications for meeting the need for student accommodation?

Are the provisions for sports facilities appropriate, having regard to any playing field study and strategy?

42. Policy SP48: Nielsen, London Road (Thornhill Park)

The contents of COM.10, the Statement of Common Ground, are noted.

43. Policy SP49: Old Power Station

Is the list of uses meant to include "academic institutional use"?

44. Policy SP51: Oxford Brookes University Marston Road Campus

Is there a planning reason why the policy does not allow for student housing on the campus?

45. Policy SP52: Oxford Stadium

Can the Council point to a detailed and up-to-date viability assessment to demonstrate that development in accordance with these policy requirements would be viable and whether it would be likely to be delivered?

Can the Council provide sound and up-to-date evidence to demonstrate that the revival of greyhound racing and/or speedway is a viable and attractive proposition for operators and site owners?

Given the considerable housing need in Oxford, would the approach taken by this policy deliver enough homes?

46. Policy SP53: Oxford University Press Sports Ground

What would be the objection to the University developing, say, employer-linked housing or student accommodation on its own land?

47. Policy SP55: Radcliffe Observatory Quarter; Policy SP66: Ruskin College Campus and Policy SP57: Ruskin Field

Please can the Council point to any work that has been carried out that addresses the concerns raised in representations about heritage and landscape settings.

48. Policy SP62: Valentia Road site

It has been drawn to our attention that the Headington Neighbourhood Plan identifies this site as a public access green space. Please can the Council comment on this situation and explain how it will be resolved.

49. Policy SP64: Wolvercote Paper Mill

Does the policy reflect the terms of any current planning permission?

50. Policy SP65: Bayards Hill Primary School Part Playing Fields

Please can the Council explain how much of the site is expected to be used for housing and how this policy would comply with paragraph 97 of the NPPF.

51. Policy SP66: William Morris Close Sports Ground

When was the site last used for sports use? Is it feasible to retain the playing pitch now, both in terms of the physical space available, and in respect of potential demand?

Jonathan Bore

Nick Fagan

15 July 2019

