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Debbie Dance
Director
Oxford Preservation Trust

30th October 2019

Dear Ms Dance

Thank you for your letter of 29 October. Whilst we have not invited representations at this stage, we are treating your letter as an examination document because it raises issues that may be of wider interest.

The examination mostly takes place in writing and we have given careful consideration to the evidence base and to all the written representations. The Oxford Preservation Trust made a number of points in writing at Regulation 19 stage and we have taken them into account along with the Council's response to our questions. Written representations carry as much weight as hearing appearances.

Hearing sessions are used to enable us to gain information about topics we need to know more about. We do not normally hold hearing sessions into matters in which the representations and the evidence base are clear and comprehensive and where we consider that we have sufficient information.

Whilst we have made a number of written comments to the Council in respect of the heritage policies in the submitted plan, we are of the preliminary view that, subject to the appropriate modifications, the plan, through its policies and explanatory text, does contain a positive strategy for the conservation of the historic environment. This includes maintaining the significance of the heritage assets, granting planning permission that respects and draws inspiration from Oxford's unique historic environment, protecting views and maintaining control over building heights. The explanatory text to Policy V5 demonstrates an appreciation of the role of tourism in the city, and the policy, though regulatory in nature, does allow for the provision of new tourist attractions (and by inference, extensions, as confirmed in the explanatory text). It is not necessary for a plan to make references to separate stand-alone documents such as the National Heritage List for England or the Historic England Heritage at Risk Register, nor is it necessary to refer in every case to historic buildings and their settings in site allocation policies, since there are separate policies in the plan that deal with heritage assets and their settings and the plan must be read as a whole. For these reasons we decided not to include a hearing topic on "Heritage".

The plan does not appear to us to preclude the consideration of the important issues that are raised by yourselves. There is a limit to the amount of detail that can appropriately be put into a document such as a Local Plan; the important thing is that it provides an appropriate strategy for the management of development that is consistent with national policy. Where necessary it can provide a framework for the subsequent production of detailed policy and guidance.

Having regard to the points you raise, we will however ask the Council two further questions in writing: firstly, whether the Plan says enough about heritage assets at risk, and their viable use consistent with their conservation; and secondly, whether a City Centre policy is necessary in the manner of the modifications for the “Areas of Change”.

Finally, as you know, the main modifications to the plan will themselves be subject to consultation after the hearings have been held, so you will be able to make further representations at that stage.

Yours sincerely

Jonathan Bore

Nick Fagan

Inspectors
30 October 2019