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By email: [planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk)

Dear Sirs

## **OXFORD CITY COUNCIL LOCAL PLAN MAIN MODIFICATIONS CONSULTATION**

### **1.0 INTRODUCTION**

- 1.1 Oxford Preservation Trust ("the Trust") is pleased to respond to Oxford City Council's ("the City Council") Local Plan ("the Local Plan") Main Modifications Consultation.
- 1.2 The Trust was established in 1927 as a charity and local amenity society with the principal aim of conserving and enhancing Oxford and its setting. It takes a forward thinking and positive approach to development, looking to influence change rather than stopping it, preserving the best of the old and encouraging the best of the new. It is committed to ensuring that Oxford can continue to flourish and prosper, whilst protecting its historic character and setting.
- 1.3 The Trust owns and looks after 1000 acres of land in and around Oxford making green space available for local people to benefit from and enjoy.
- 1.4 The Trust has detailed knowledge and expertise built up over a number of years so that it is legitimately recognised as a professional and experienced voice. It is able to speak with conviction on matters relating to landscape, views and the impact of development on the City of Oxford and its heritage, and on its green setting and surrounds.

### **2.0 GENERAL COMMENTS**

- 2.1 The Trust has reviewed the Main Modifications schedule, the "strike-through" version of the Local Plan, the various correspondence between the Inspectors and the Council and the supporting evidence and Sustainability Appraisal.
- 2.2 The Trust specifically acknowledges the correspondence between the City Council and the Inspectors relating to heritage and the city centre (document references IC.4 and OCC.4). This is the first opportunity the Trust has had to respond to this correspondence. The Trust is pleased to note that some of its suggested modifications are part of this consultation. Respectfully, the Trust considers that there remains a considerable weakness in the Local Plan as presented as the City Council's approach



continues to be a reactive one in relation to conservation and enhancement of the historic environment, relying on the ability to respond to external actions and applications rather than taking a more positive and pro-active role. The Trust continues to press for the City Council to seek and identify opportunities and risks to the historic environment and allocate actions or remedies as appropriate. We make particular reference here to those heritage assets to which the public have access, for instance views of the Oxford skyline which could be celebrated as both a heritage and an economic asset.

2.2 [REDACTED] approach to the site policies has become confused. In some cases site-specific policies or constraints e.g. effects on the Lye Valley SSSI, and in relation to the loss of [REDACTED] or have been introduced for individual sites, and then, in addition, appear within general policies of the Local Plan. This is in direct contrast to the decision to remove potentially important references to specific heritage assets and their setting, where the decision has been made to include such references in site-specific policies elsewhere in the Local Plan. This has resulted in a Plan, as a whole, which is ambiguous, ineffective and as such unsound.

2.3 [REDACTED] consider (a) 'the plan should be read as a whole' and site-specific policies should only cross refer – in the supporting text – to other policies of particular relevance; or, (b) more helpfully, specific constraints and the appropriate approach to avoidance or mitigation should be detailed in the site-specific policies. Option 'b' should be possible at the plan making stage if the City Council is prepared to limit development on the allocated sites.

2.4 [REDACTED] that, if the appropriate management of known constraints is simply left to the discretion of the City Council, then these constraints will not be given the full and necessary assessment and the most appropriate mitigation measure might be missed. It is surely accepted best practice that early engagement with challenges and constraints provides for better results. We question in some cases whether constraints may be too great to allow for development to happen, and what of cumulative

2.5 [REDACTED] City Council that there should be an ambition to see the Local Plan deliver a minimum number of homes. It is the Trust's contention that a more detailed assessment of site-specific constraints is necessary. It is surely not appropriate for a 'blanket' minimum number of homes or quantum of development to be stated at each site. As an example, in locations such as those sites in the setting of Bartlemas Conservation Area where low density is the prevailing character, then a more appropriate

2.6 The City Council has declared a climate emergency and has set some ambitious targets on carbon neutrality by 2030, which is within the lifetime of this Plan. The Trust has therefore been surprised that there are not stronger policies within this Plan to help them to achieve this. The Trust believes that there should be an immediate start to prepare the next Plan if this is to be an ambition. There should be an immediate commitment to the collection of data regarding [REDACTED] and climate change with a view to strengthening its planning policies in this regard. The Trust does not feel that the City Council should rely on the Oxfordshire Plan 2050 for this though it is possible that a steer on these matters may emerge through the Oxfordshire Plan 2050.



- 2.7 The Trust wants to see a commitment from the City Council to ensuring that all new development is designed and delivered in the most sustainable way possible. The Trust is of the view that all parties should give proper consideration as to how future generations will live and use their homes, and workplaces, and to how they will move around. Local Plans have a key role to play in shaping this future and should strive to lead and show imagination and innovation.
- 2.8 [REDACTED] challenges of housing need are unlikely to abate significantly in the continued joint working of all the Oxfordshire Authorities is very much [REDACTED] Trust feels that a proper balance needs to be taken in relation to the [REDACTED] enhancing Oxford's green setting and heritage assets and is willing to engage in dialogue to assist in this happening.
- 2.9 The Trust remains unconvinced however, that the proposed 'Oxfordshire 2050: Joint Statutory Spatial [REDACTED] age with all the challenges. The Local Plans across the area are [REDACTED] to the Green Belt. The Trust is of the strong opinion that permanence [REDACTED] Green Belt and that changes to it to allow development should not be considered again within the lifetime of this Plan (The JSSP is expected to be adopted by 2020) to ensure that it has some level of permanence, as explained in the NPPF at paragraph 136:
- "Strategic policies should establish the need for any changes to Green Belt boundaries, [REDACTED] intended permanence in the long term, so they can endure beyond the [REDACTED]"*
- This matter is one which the Trust will continue to monitor and engage with at the appropriate opportunities.
- 2.10 The Trust strongly recommends that the City Council considers a chapter in the next Local Plan that [REDACTED] manage and enhance tourism in Oxford. This should include the [REDACTED] additional bed spaces and hotels and associated allocations. This could [REDACTED] siting and linking tourist destinations across the city to manage where [REDACTED] improvements also promoting regeneration where necessary to ensure the vitality of the tourist economy.
- 2.11 The Trust firmly believes that there should also be a better plan to manage tourist coaches in the City. [REDACTED] traffic impact, but also the impact that coaches have on the built [REDACTED] ve around the city given that coaches are the arrival and departure [REDACTED] This matter is also one that could be positively and effectively engaged [REDACTED] rism strategy.
- 2.12 A tourism strategy can be achieved by the City Council working in partnership with stakeholders such as Experience Oxfordshire, the destination management organisation for the City, and with large and small [REDACTED] tailors i.e. Westgate Shopping Centre. This could be evolved into an [REDACTED] for the city centre, though this could also be considered for other parts [REDACTED] also seek to encapsulate the "cultural and social activities" to maintain [REDACTED] sustainability.



2.13 Finally, the wider regional issues relating to Oxford and its role as part of the UK economy and the south east growth agenda, including the Oxford to Cambridge Arc, should be considered in both the City Local Plan and the JSSP and the Trust is looking forward to working constructively on these issues in due course.

**Main Modifications**

2.14 [REDACTED] a range of the proposed Main Modifications in plan order. The Trust [REDACTED] some other concerns it raised at regulation 19 were not deemed of [REDACTED] discussed during the hearing sessions. The Trust remains particularly concerned that its suggested modifications for the following policies are not included in the schedule at consultation:

[REDACTED] VIBRATION  
[REDACTED] N OF EXISTING GREEN INFRASTRUCTURE FEATURES  
[REDACTED] LITY DESIGN AND PLACEMAKING

- POLICY M4: PROVISION OF ELECTRIC CHARGING POINTS

The Trust respectfully requests that its submissions made under Regulation 19 are reviewed by the [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



**3.0 CHAPTER 2. BUILDING ON OXFORD'S ECONOMIC STRENGTHS AND ENSURING PROSPERITY AND OPPORTUNITIES FOR ALL**

3.1 The Trust is concerned that there is insufficient consideration given to the constraints. The Trust suggests that greater importance should be given to heritage matters. There are also examples of the inconsistent approach to policy writing – some policies mention some constraints and not others, and the [redacted] be an effective duplication of the site-specific policies for the hospital that additional policy changes are necessary to create sustainable [redacted] to help to conserve and enhance its setting and its character.

**MM3 - POLICY E1: EMPLOYMENT SITES**

2007 - 112.1 - MM3/E1

[redacted]	Yes	Positively prepared	Yes
[redacted]	No	Justified	Yes
[redacted]	Yes	Effective	No
[redacted]		Compliant with national policy	No

3.2 The Trust is concerned that proposed modification MM3 does not go far enough and fails to acknowledge [redacted] of the 'intensification' of employment uses. The Trust accepts the [redacted] Plan to be read – and used – 'as a whole' but to omit the consideration [redacted] high-risk approach and could place important assets at risk of harm. [redacted] defined criteria to ensure that the policy is fully effective and conforms to national policy, especially the provisions of sustainable development as described at paragraph 11 of the NPPF.

**Suggested modification**

3.3 [redacted] E1 is fully effective and conforms with the premise of sustainable [redacted] the following revision (additions underlined):

*Intensification of uses:*

*Planning permission will be granted for the intensification, modernisation and regeneration of [redacted] can be demonstrated that the development:*

*[redacted] sity development (with more employment floorspace and jobs per [redacted] take the best and most efficient use of land; and*

*ii) protects areas or assets of particular importance including the natural environment and heritage assets and their setting and does not cause unacceptable environmental impacts and*

**MM4 - POLICY E2: TEACHING AND RESEARCH**



2008 -  
112.2 -  
MM4/  
E2

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

3.4 [REDACTED] remains insufficient consideration of the constraints in this policy. [REDACTED] and research is understood, and supported by the Trust, the policy ensure that proposals consider planning constraints at the earliest

3.5 The Trust also notes that the majority of this policy is duplicated in site specific polices SP20 (Churchill), SP21 (Nuffield) and SP42 (The JR). This creates an inconsistency and an ambiguity about the role of [REDACTED] deemed acceptable to repeat in site-specific policies but, in direct contrast, [REDACTED] in the site-specific policies. The Trust seeks the clarification on this

3.6 The omission of the consideration of constraints in the policy renders it ineffective and relying on the application process will not help efficient decision making. A criterion should be included in policy E2 to ensure that the policy is fully effective and conforms to national policy, especially the provisions of sustainable development as described at paragraph 11 of the NPPF.

3.7 [REDACTED] E2 is fully effective and conforms to the premise of sustainable development, MM4 should include the following paragraph:

*Planning permission will be granted for the redevelopment and intensification of the University [REDACTED] can be demonstrated that the development protects areas or assets of [REDACTED] including the natural environment and heritage assets and their setting [REDACTED] acceptable environmental impacts and effects.*

[REDACTED]

[REDACTED]



**4.0 CHAPTER 4. MAKING WISE USE OF OUR RESOURCES AND SECURING A GOOD QUALITY LOCAL ENVIRONMENT**

MM16 - POLICY RE3: FLOOD RISK MANAGEMENT

2009 -  
112.3 -  
MM16/  
RE3

Legally compliant	Yes	Positively prepared	Yes
	es	Justified	Yes
	es	Effective	Yes
		Compliant with national policy	Yes

4.1 The Trust is keenly aware of the risk of flooding and the potential impact on people lives, the built fabric and the green infrastructure of Oxford. The Trust welcomes the removal of references to the Oxford ( ), since both the application and compulsory purchase order request

MM18 - POLICY RE7: MANAGING THE IMPACT OF DEVELOPMENT

2010 -  
112.4  
-  
MM18  
/RE7

Legally compliant	Yes	Positively prepared	Yes
	o	Justified	Yes
	es	Effective	No
		Compliant with national policy	No

4.2 The Trust is concerned that there remains no reference to heritage or natural environmental assets in proposed policy RE7. The Trust considers that this is necessary to ensure the policy is effective but also ( ) with NPPF paragraph 193.

4.3 To ensure that policy RE7 can be considered to be effective and consistent with national policy, MM18 should include the following text (additional words underlined):

( ) *only be granted for development that:*  
*( ) the quality of communities, occupiers and neighbours is protected; and*  
*( ) assessed transport impacts affecting communities, occupiers, neighbours*  
*and the existing transport network; and*  
c) conserve or enhances biodiversity; and  
d) conserves and enhances heritage assets and their setting; and  
*( ) measures where necessary.*



**5.0 CHAPTER 5. PROTECTING AND ENHANCING OXFORD'S GREEN AND BLUE INFRASTRUCTURE NETWORK**

5.1 Chapter five of the Local Plan still does not provide a strong and distinct local picture for green and blue infrastructure of Oxford. This part of the Local Plan remains generic and, in particular, does not pay sufficient regard to the green setting of Oxford, and its diverse species.

2011 -  
112.5  
-  
MM19  
/G1

[REDACTED]

**CONDITIONS OF GREEN AND BLUE INFRASTRUCTURE NETWORK**

Legally compliant	Yes	Positively prepared	No
Sound	No	Justified	Yes
[REDACTED]	Yes	Effective	No
		Compliant with national policy	No

5.2 [REDACTED] strongly supports the protection of the existing green and blue infrastructure networks in the city and is pleased to see them recognised within the Local Plan. The green spaces of the city, and indeed those beyond its administrative boundaries, are a vital part of its setting, both in a heritage context, but also for the health and wellbeing of the City and its residents. [REDACTED] has serious concerns that policy G1 is not positively worded. Whilst the [REDACTED] is no provision for green and blue infrastructure improvements.

5.3 [REDACTED] planning for identified needs. There is no strategy to improve or enhance areas of green space for biodiversity or recreation, and key amongst potential opportunities could be the beneficial use of the Green Belt. There is no commitment to work with key stakeholders or landowners. This is a missed opportunity in the Local Plan.

5.4 [REDACTED] proposed policy – G9: New and enhanced green and blue [REDACTED] to be the articulation of a positive strategy, but there is an over- [REDACTED] 'development management' style approach. Having criteria-based [REDACTED] as part of a Local Plan but without overarching positive strategies they are ineffective.

5.5 The NPPF is clear at paragraph 20 that Local Plans should include policies to conserve and enhance the [REDACTED] the latter need to 'enhance' is currently missing from the City Council's [REDACTED] notes the *provision* of green infrastructure networks to promote healthy [REDACTED] to help to mitigate climate change (para. 150) and *enhancing* these [REDACTED]

**Suggested modification**

5.6 The Trust [REDACTED] comprehensive strategy to protect and specifically *enhance* the Green and [REDACTED] the city should be developed by the City Council and committed to in [REDACTED]

5.7 [REDACTED] considered to be positively worded, effective and consistent with national policy MM19 should include the following amendments (additional words underlined and deleted ~~struck through~~):

**Policy G1: ~~Protection of~~ The Green and Blue Infrastructure Network**

Green and open spaces and waterways of the Green and Blue Infrastructure Network are protected for their social, environmental and economic functions and are defined on the Policies Map.

[Redacted]

taken, as part of development proposals, to contribute to and enhance infrastructure networks as appropriate. Improving access to the networks also people's enjoyment is expected through development and the practice guides is encouraged.

The City Council will work with partners including wildlife trusts and landowners to develop and maintain a green and blue infrastructure strategy that will conserve and enhance these precious

[Redacted]

T

2012 -  
112.6  
-  
MM21  
/G3

Legally compliant	Yes	Positively prepared	No
Sound	No	Justified	Yes
[Redacted]	es	Effective	No
[Redacted]		Compliant with national policy	No

5.8 The Trust welcomes the provision of MM21 which is to remove the opening part of the proposed policy G3. However, there remains a gap in the policy, which would reflect the findings of the evidence base study - *Identification of opportunities to enhance the beneficial use of Green Belt land*. Policy G3 should identify locations where the beneficial use of the Green Belt could be improved, particularly if areas of [Redacted] and lost to development.

[Redacted]

5.9 The City Council should identify locations within the Green Belt that can be used for the public benefit. This detail can be included in the supporting text. Obligations sought as part of development on previous Green Belt land could be put towards projects that allow for better access or the preservation of [Redacted] in Belt.

[Redacted]

5.10 [Redacted] and that could be used for such beneficial uses and would welcome [Redacted] a positive strategy.

5.11 In the meantime, to ensure that policy G3 is a fully effective policy, MM21 should include the following text (additional words underlined):

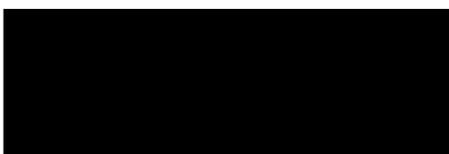
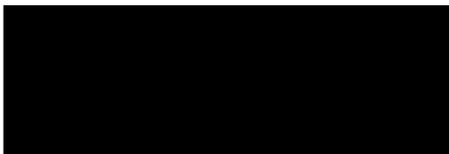
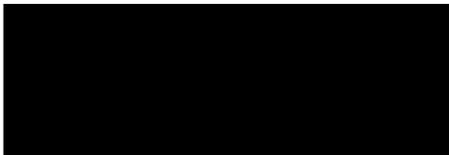
[Redacted]

ent Green Belt will be determined in accordance with national policy. Planning permission will not be granted for inappropriate development within the Green Belt, in accordance with national policy.



The City Council will work in partnership with stakeholders including land owners, to take opportunities to improve the beneficial uses of the Green Belt and will seek planning obligation from the proposed inset land to help to fund appropriate projects to offset the loss of that Green Belt land.

The Green Belt Boundary is defined on the Policies Map.



**6.0 CHAPTER 6. ENHANCING OXFORD'S HERITAGE AND CREATING HIGH QUALITY NEW DEVELOPMENT**

6.1 I set out at the start of this letter that the Trust respectfully submits that the issues it raised at the Regulation 19 Publication stage consultation have not been fully considered or assessed (including through the correspondence IC.4 and OCC.4). The Trust maintains its serious concerns about the [redacted] Plan chapter six. The flaws in this chapter can only be concluded as [redacted] regard is not paid to a significant element of national policy. There [redacted] chapter, of a positive strategy for the historic environment (as required [redacted] The Trust is, however, pleased to see that some of its suggested modifications have been taken on board and also there are improvements to polices DH3 and DH5, but Development Management details remain limited.

6.2 [redacted] were submitted at Regulation 19 and are not repeated here, but it is [redacted] and when reviewing the comments hereunder.

**D BUILDING HEIGHTS**

2013 - 112.7 - MM25/DH2

Legally compliant	Yes	Positively prepared	No
[redacted]	No	Justified	Yes
[redacted]	Yes	Effective	No
[redacted]	[redacted]	Compliant with national policy	Yes

6.3 MM25 is a result of the Council missing an opportunity to reflect and articulate its evidence in an appropriate manner. The Trust notes the Inspectors' comments that technical notes are not policy and were not part of the examination and so cannot be part of a policy in the Development Plan. Instead the [redacted] explain that applicants need to be aware of building heights in Oxford [redacted] the setting and significance of internationally important heritage assets.

6.4 [redacted] by the need to change the provisions of this policy from policy HE.9 (high building area) of the previous Local Plan (2001-2016). There does not appear to be very strong evidence for the need to change the policy, particularly regarding the setting of the Carfax Tower. Para 6.18 states that taller buildings *will* be possible, but there is not sufficient evidence and assessment to support such [redacted] ers that this statement should be revised to say it *may* be possible. [redacted] t appropriate that development should only be allowed in exceptional [redacted] it can be demonstrated to be in the public benefit.

**Suggested modification**

6.5 To ensure that proposed policy DH2 is fully justified and effective, the Trust suggest that MM25 should [redacted] the policy as follows (underlined text in addition and ~~struck through~~ [redacted])

[redacted] to retain significant views both within Oxford, out from the city and particular those that play a role in preserving and enhancing the significance and setting of to and from the historic skyline. Planning permission will not be

granted for any building or structure that would harm the special significance of Oxford's historic skyline.

Planning permission will be granted for developments that conserve and enhance the significance and setting of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outward from it. As part of this, proposals should demonstrate of appropriate height and or massing, ~~as demonstrated by using the following~~ should be met...

[Redacted]

metre radius of Carfax tower (the Historic Core Area) contains all the historic skyline, so new developments that exceed 18.2 m (60 ft) in height or ordnance datum (height above sea level) 79.3 m (260 ft) (whichever is the lower) are likely to intrude into the skyline. Development above this height will only be permitted in exceptional circumstances and should be limited in bulk and must be of the highest design

[Redacted]

proposed development that exceeds that height should demonstrate a that there is a public benefit arising, proposals will also be required to so that the full impacts of any proposals can be understood and

MM26 - POLICY DH3: DESIGNATED HERITAGE ASSETS

2014 -  
112.8  
-  
MM26  
/DH3

[Redacted]	es	Positively prepared	Yes
[Redacted]	o	Justified	Yes
[Redacted]	es	Effective	No
duty to cooperate		Compliant with national policy	No

6.6 The Trust supports policy DH3 and the majority of the proposed changes at MM26 but remains of the [Redacted] primary 'development management' policies for listed building and [Redacted] to be fully effective, or compliant with the requirements of NPPF para.

6.7 The Trust is concerned that the City Council is seeking to unnecessarily caveat the role of the 'setting' of heritage assets.

6.8 [Redacted] ing an element of national policy that explains how new development of significance – development involving heritage assets and their setting [Redacted] e." This should also be positively reflected in the proposed policy.

**Suggested modification**

6.9 To ensure policy DH3 is complaint with national policy is should be accompanied by development [Redacted] particularly for listed buildings and structures etc. and for Conservation [Redacted] include reference to Heritage at Risk, the Historic Environment Record [Redacted] scape Characterisation.

6.10 [Redacted] of MM26, but suggests two amendments as follows (underlined text in addition and ~~struck through~~ deleted):



Planning permission or listed building consent will be granted for development that respects and draws inspiration from Oxford's unique historic environment (above and below ground), responding positively to the significance and setting of the character and distinctiveness of the heritage asset and locality. Proposals that better reveal the significance of heritage assets will be encouraged.

For all planning decisions for planning permission or listed building consent affecting the [redacted] and heritage assets, great weight will be given to the conservation of [redacted] of the asset where it contributes to that significance or [redacted] (significance).

MM27 - POLICY DH4: ARCHAEOLOGICAL REMAINS

[redacted]	Yes	Positively prepared	Yes
[redacted]	Yes	Justified	Yes
[redacted]	Yes	Effective	Yes
[redacted]	Yes	Compliant with national policy	Yes

2015  
-  
112.9  
-  
MM27  
/DH4

6.11 The Trust is pleased to see that in this case its suggested modifications have made it into the schedule [redacted] MM27.

POINTS AND SIGNAGE

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
[redacted]	Yes	Effective	No
[redacted]	Yes	Compliant with national policy	No

2016 -  
112.10  
-  
MM29/  
DH6

6.12 [redacted] focused on the need to improve the factual content of proposed policy DH6, to include advertisement consent. However, the Trust considers that, MM29 should be expanded to properly describe heritage assets and their setting.

6.13 [redacted] DH4 is fully effective and compliant with national policy MM29 should [redacted] as follows (underlined text in addition and ~~struck through~~ deleted):

Planning permission will only be granted for new or changed shopfronts and advertisement consent will only be granted for signage and other forms of advertisement where the design, [redacted] colour, proportion and illumination are not detrimental to heritage assets, [redacted] ~~setting assets with heritage significance~~ or visual or residential amenity, [redacted] the following criteria, all of which should be met:

[redacted] to and positively contributes to the character and design of existing buildings and surroundings (including the significance and setting of heritage assets where appropriate); and...



**7.0 CHAPTER 7. ENSURING EFFICIENT MOVEMENT INTO AND AROUND THE CITY**

7.1 The Trust wishes again to highlight that transport has a very real impact on land use and the built environment and therefore greater and more explicit engagement with the challenges identified, would be welcomed in the Local Plan.

2017 -  
112.11  
-  
MM30/  
M1

ENSURING WALKING, CYCLING, AND PUBLIC TRANSPORT

Sound	Yes	Positively prepared	Yes
	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

7.2 [Redacted] the effectiveness of policy M1. The Trust understands that there is a [Redacted] work in partnership with the County Council on transport matters but [Redacted] is too passive and therefore not effective. There should be greater commitment from the City Council to work *in partnership* with the County to develop a strategy, especially to manage tourist coaches.

7.3 [Redacted] effective policy, MM30 should include further amendments under the [Redacted] follows (underlined, is suggested as an addition to the policy and ~~struck through~~ to be deleted):

*ii) supporting working in partnership with the County Council in their to develop a comprehensive management of both scheduled and tourist coaches entering and leaving*

[Redacted]

2018 -  
112.12  
-  
MM32/  
M3

VEHICLE PARKING

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
[Redacted]	Yes	Effective	No
		Compliant with national policy	Yes

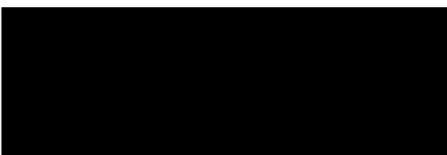
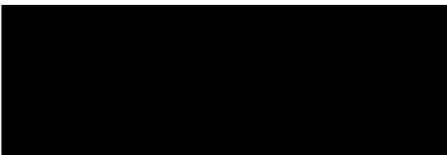
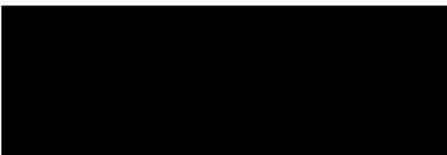
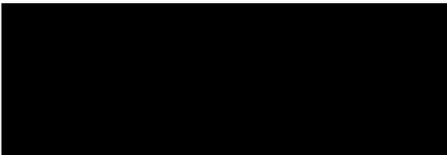
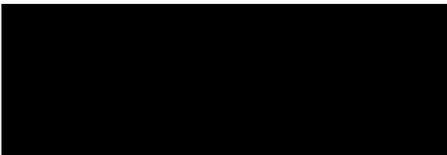
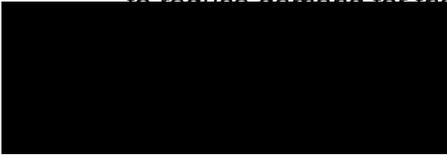
7.4 The Trust is supportive of the changes suggested through MM32 and of course, of the principle of car-free housing developments and they are certainly appropriate in much of the city centre. However, the Trust considers that the lack of any reference to public parking spaces, suggests that the draft policy is [Redacted] Council Local Plans have talked about there being no increase in the city [Redacted] the appropriately and the Trust considers that there should be a specific [Redacted]

7.5 The Trust suggest that the scope of MM32 should be extended to move the management of public car parking spaces into the policy wording.

**Suggested modification**

7.6 To ensure that proposed policy M3 is effective, MM32 should include the following paragraph:

*The numbers of off-street and on-street public parking spaces over the life of the Plan will be capped at 1942 and 255 respectively and that reductions will be achieved as other measures to reduce demand for the private car are implemented.*



**8.0 CHAPTER 8. PROVIDING COMMUNITIES WITH FACILITIES AND SERVICES AND ENSURING OXFORD IS A VIBRANT AND ENJOYABLE CITY TO LIVE IN AND VISIT**

8.1 The Trust is pleased that its suggestions to include opportunities to develop residential opportunities in the city and neighbourhood centres has been embraced. However, the Trust is concerned that there remains an absence of a strong and positive strategy for active change.

[REDACTED]

**SHOPS AND SHOP FRONTAGES IN THE CITY CENTRE**

2019 -  
112.13 -  
MM35/  
V2

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
[REDACTED]	[REDACTED]	Effective	Yes
[REDACTED]	Yes	Compliant with national policy	Yes

8.2 [REDACTED] supports that MM35 and MM37 have introduced the following text:

*"...planning permission will be granted for development of upper storeys for housing, student accommodation and other uses appropriate to a town centre as long as the functioning of the ground floor retail and service uses and the street scene is not undermined."*

[REDACTED]

8.3 [REDACTED] identified in paragraph 118 of the NPPF:

*Planning policies and decisions should:*  
*d) promote and support the development... to meet identified needs for housing... [of] space above shops"*

[REDACTED]

[REDACTED]

[REDACTED]



**9.0 CHAPTER 9. AREAS OF CHANGE AND SITE ALLOCATIONS**

9.1 I set out at the beginning of this letter that the Trust maintains its fundamental concerns about the site allocation policies included in the Local Plan. They are imprecise, provide little direction for what is expected and as such do not give confidence to the community, applicants or other stakeholders and respondents in what will be delivered, how it will be delivered, and by when. Through this modifications [redacted] introduced into the policies, with some constraints which are covered by [redacted] repeated alongside an allocation, and in other cases not allowed as they [redacted]. Moreover, whilst the constraints are identified, there is little direction [redacted] managed, or any guidance of the opportunity they might present, which ultimately undermines any attempt at positive planning.

9.2 The Trust is pleased to note that indicative numbers are now quoted in the site allocation polices. [redacted] appear to have been moderated from the high-level land availability [redacted] into policy. Also, the word 'minimum' is repeatedly used, and the Trust [redacted] heritage assets and their settings might be affected, that this might not [redacted] is referred to against specific sites through these submissions.

9.3 The Trust is pleased to note the deletion of the repeated phrase "*Planning permission will not be granted for any other uses*." However, it has then been replaced by the superfluous comment that: "...*other [redacted] considered on their merits...*". This is not necessary as it is implied by [redacted] law, and therefor serves little purpose in the policies.

**THE WEST END**

2020 -  
112.14  
-  
MM45/  
SP1

Legally compliant	Yes	Positively prepared	Yes
[redacted]		Justified	No
[redacted]		Effective	No
[redacted]		Compliant with national policy	Yes

9.4 The Trust does not believe that the use of the word minimum is appropriate in this policy where it refers to development quantum and housing numbers. The site is in a sensitive location and in views from [redacted] skyline. The Trust notes that building heights are referenced in the [redacted] paragraph 9.12, but there is no reference to the same within the policy.

9.5 The Trust suggests that the housing figure is described as 'indicative' or 'approximate' and that reference is made to the fact that the setting of the Oxford skyline and the effects on the views may have an impact on development capacity. MM45 should then be amended to include the following text

[redacted] *be granted for developments that demonstrate that they are capable [redacted] enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy DH2).*



9.6 The Trust notes that the requirements for enhanced open space are included in proposed policy SP1 which are, in effect, a repetition of policy H16 so it would be a logical reflection to include provisions as might be required from DH2.

MM48 – POLICY SP2: OSNEY MEAD

2021 -  
112.15  
-  
MM48/  
SP2

		Positively prepared	Yes
		Justified	Yes
		Effective	No
to cooperate		Compliant with national policy	Yes

9.7 The Trust is pleased to note that there is now a stronger commitment to the delivery of a pedestrian scheme and proposed policy. The Trust also cautiously welcomes the [redacted] considering the number of dwellings which will be delivered. The site is [redacted] of the most important view cones and the quantum of development [redacted] managed.

9.8 The Trust notes that building heights are referenced in the supporting text to the policy at paragraph 9.22, but there is no reference to the same within the policy. Indeed, there is the suggestion that [redacted] *to or out of the historic core must be avoided.*” The Trust is surprised [redacted] in the supporting text, the policy itself is much more equivocal.

9.9 The Trust suggests that for policy SP2 to be effective the scope of MM48 should be broadened to include at least a reference to conformity with policy DH2, to reflect the reference to H9 and give [redacted] the amount of [redacted] student numbers, or even better the following text should be included:

[redacted] *be granted for developments that demonstrate that they are capable [redacted] enhancing the significance and setting (including its green setting) of the [redacted] Oxford’s historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy DH2).*

OXFORD FIELDS SCHOOL ATHLETICS TRACK

2022 -  
112.16  
-  
MM57/  
SP5

		Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

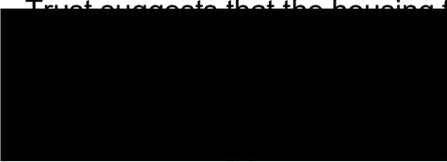
9.10 [redacted] the use of the word minimum is appropriate in this policy where it refers to [redacted] housing numbers. The site is in a sensitive location and development may have an adverse effect on the setting of Oxford and as such suggests that reference to building heights and heritage setting is of value. This site is visible in Oxford’s green setting, Green Belt and the Cherwell Valley. What is built here will affect views across from the River Cherwell and Marston



fields. This is an example of a location that might be overlooked for such an assessment because it is not within a 'view cone,' but that does not mean that views into or out of the city, and the green setting of the city, are necessarily unaffected.

**Suggested modification**

9.10 Trust suggests that the housing figure is described as 'indicative' or 'approximate' and that reference is made to the green setting of the Oxford may have an impact on development capacity. MM58 should include the following text by way of further explanation:



*... be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy DH2).*



... PLACE AND EWERT HOUSE

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty		Effective	No
		Compliant with national policy	Yes

2023 -  
112.17  
-  
MM58/  
SP6

9.11 The use of the word minimum is appropriate in this policy where it refers to development quantum and housing numbers. The Trust has some concerns that development on this site may have an adverse effect on the views and as such suggests that reference to building heights and heritage/green setting is of value. This site is visible in Oxford's green setting, the 'green fingers' that extend outwards within the city's urban form, and the Cherwell Valley. This is an example of a location that might be overlooked for such an assessment because it is not within a 'view cone,' but views into or out of the city, and the green setting of the city, are necessarily unaffected.

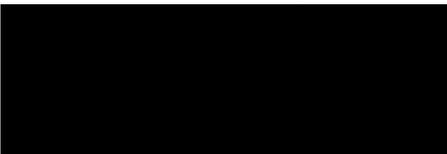


**Suggested modification**

9.12 The Trust suggests that the housing figure is described as 'indicative' or 'approximate' and that reference is made to the green setting of the Oxford may have an impact on development capacity. MM58 should include the following text by way of further explanation:



*... be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and from it looking outwards (in accordance with Policy DH2).*



... STADIUM SITES

		Positively prepared	Yes
Sound	No	Justified	Yes

2024 -  
112.18  
-  
MM69/  
SP15



Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

9.13 The Trust remains particularly concerned that this policy makes no reference to the Grade II listed Minchery Farmhouse that is on the site. This farmhouse is in a poor state of repair and is included in the Heritage at Risk register. It should be included in the policy; applicants should be required to [redacted] and look to bring it back into a sustainable, if not viable, state.

9.14 The Trust suggests that for policy SP15 to be effective and compliant with national policy, the scope of MM69 should be extended to include the following text to secure the preservation of the listed building on site:

[redacted]

*...ected to demonstrate how development will seek to conserve and [redacted] Minchery Farmhouse. The register the City Council will work with [redacted] relevant stakeholders to consider enabling development that secures the sustainable future of the farmhouse.*

2025 -  
112.19  
-  
MM53/  
SP17

MM53 – POLICY SP17: GOVERNMENT BUILDINGS AND HARCOURT HOUSE

[redacted]

Compliant with the duty to cooperate	Yes	Positively prepared	Yes
		Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

9.15 [redacted] the use of the word minimum is appropriate in this policy where it refers to housing numbers. The Trust is also acutely concerned about the [redacted] to heritage assets in MM53. The explanation for the proposed [redacted] documents OCC.3, Matter 6K, and IC.3 and each appears to reach a different conclusion about how the policy ought to approach the matter of heritage assets / constraints. However, the Trust broadly understands that the feeling is that policy DH3 is sufficient to manage the potential effects of the development and nothing more needs to be said in a site-specific policy.

9.16 [redacted] in the approach. First, there is an inconsistency here, where it is [redacted] reference New Marston Meadows SSSI in an effective repetition of [redacted] to heritage assets is apparently not seen as necessary or appropriate. Second, the setting of heritage assets has the very real potential to affect the development capacity of a site. Therefore, if – as the Trust suggests – the policy properly refers to the indicative number of new homes then the reason for this can be explained. Moreover, any applicant will have clarity as to how [redacted] specific reference to this site when the specific local characteristics of [redacted] imposed through its policy wording. For the policy to be effective, and [redacted] timely delivery of appropriate development, it makes sense to include [redacted] specific heritage assets.

**Suggested modification**



9.17 The Trust suggests that the housing figure is described as 'indicative' or 'approximate' and that reference is made to the fact that the setting of the designated heritage assets may have an impact on development capacity. The Trust suggests that for policy SP17 to be effective and compliant with national policy MM53 should reinstate the references to the Conservation Area and it should be amended as follows (additional text underlined and deleted ~~struck through~~):

~~Development should not have an adverse impact upon~~ conserve and enhance the significance  
~~of the site and its setting~~ of the site and its setting ~~in Hill and the St Clement's and Iffley Road~~ Conservation Areas.

~~Applications should be granted for developments that demonstrate that they are capable~~ of enhancing the significance and setting (including its green setting) of the  
~~of special significance of Oxford's historic skyline, as appreciated within the city, outside it and~~ special significance of Oxford's historic skyline, as appreciated within the city, outside it and  
~~looking outwards from it (in accordance with Policy DH2).~~ looking outwards from it (in accordance with Policy DH2).

~~to include a footway along the site frontage and a pedestrian crossing to~~ include a footway along the site frontage and a pedestrian crossing to  
~~the existing~~ the existing ~~footway network on the western side of Marston Road...~~ footway network on the western side of Marston Road...

MM69 – POLICY SP18: HEADINGTON HILL HALL AND CLIVE BOOTH STUDENT VILLAGE

2026 -  
112.20 -  
MM75/  
SP18  
(Officer  
assigned  
as  
MM69  
does not  
relate to  
this  
policy)

		Positively prepared	Yes
		Justified	Yes
		Effective	No
to cooperate	Yes	Compliant with national policy	No

The Trust does not believe that the use of the word minimum is appropriate in this policy where it refers to housing numbers. The Trust is also acutely concerned about the impact of development on heritage assets in MM69. The Trust broadly understands that the Council is competent to manage the potential effects of the development and nothing specific to this policy.

9.16 The Trust sees two issues with the approach. First, there is an inconsistency here, where it is acceptable for policy SP18 to reference New Marston Meadows SSSI in an effective repetition of reference to heritage assets is not seen as appropriate or necessary. Second, there is the very real potential to affect the development capacity of a site. The Trust suggests – the policy properly refer to the indicative number of new homes to be developed as explained. Moreover, any applicant will have clarity as to how they can conform with policy DH3 with specific reference to this site when the specific local characteristics of a heritage asset are (at least) signposted through its policy wording. For the policy to be effective, and for the Council to support the timely delivery of appropriate development it makes sense to include reference to specific heritage assets.

9.17 The Trust suggests that the housing figure is described as 'indicative' or 'approximate' and that reference is made to the fact that the setting of the designated heritage assets may have an impact on development capacity. The Trust suggests that for policy SP18 to be effective and compliant with

national policy MM69 should reinstate the references to the Conservation Area and it should be amended as follows (additional text underlined and deleted ~~struck through~~):

Development should not have an adverse impact upon conserve and enhance the significance and setting of Headington Hill and the St Clement's and Iffley Road Conservation Areas.

Planning permission will be granted for developments that demonstrate that they are capable of enhancing the significance and setting (including its green setting) of the Oxford's historic skyline, as appreciated within the city, outside it and (in accordance with Policy DH2).

SITES RELEASED FROM GREEN BELT

9.18 The Trust must accept, despite its continued strong reservations – that the Inspectors have broadly [redacted] circumstances case for removing sites from the Green Belt. The Council has not attempted to identify proactive and tangible improvements [redacted] access to it, beyond referring to the generic opportunity for enhancement [redacted] matter about which the Trust, as a Green Belt landowner, would welcome further debate.

9.19 The Trust has also been reflecting on the examination of the Local Plan to date and the emergence of [redacted] Trust broadly welcomes these policies and views them as a positive [redacted] stated at the examination, the Trust is of the view that at Marston, or [redacted] could be considered as an 'Area of Change'. This is because there is a [redacted] set from the Green Belt and developed. This will alter the character of Old Marston, and particularly the Conservation Area, when the cumulative impact is taken into account. new development will also affect people's ability to appreciate the Green Belt. The Trust suggests that an 'Area of Change' policy could be the appropriate vehicle to 'off-set' some of the loss of Green Belt [redacted] and usage of other local areas of it.

9.20 [redacted] specific concerns that are dealt with hereunder.

MM80 & MM49 - POLICY SP24: MARSTON PADDOCK

2027 - 112.21 - MM80/SP24

Legally compliant	Yes	Positively prepared	Yes
[redacted]	[redacted]	Justified	No
[redacted]	[redacted]	Effective	No
[redacted]	[redacted]	Compliant with national policy	Yes

9.20 The Trust welcomes, and supports, the introduction – through MM80 – of an indicative dwelling capacity but questions whether it is appropriate in the setting of a Conservation Area or at the edge of the city [redacted] require a minimum figure of new homes. The heritage and landscape [redacted] a limiting factor that has not been fully considered.

9.21 [redacted] concerning for the Trust. The exceptional circumstances to release land from the Green Belt are cited as: "acute housing need, housing affordability and inequality" in which case it is unlikely that other uses for the site would be acceptable. Whilst the Trust fully supports the removal of the phrase "Planning permission will not be granted for any other uses," it is felt that

2028 - 112.58 - MM49/SP24



especially on former Green Belt sites the new repeated phrase regarding “*other complementary uses*” creates a level of ambiguity that is unjustified and ineffective. It will not aid in efficient and consistent decision making.

**Suggested modification**

9.22 The Trust suggests that the housing figure is described as ‘indicative’ or ‘approximate’ and that [redacted] at the setting of the designated heritage assets may have an impact on [redacted] of compliance with policy DH3.

9.23 [redacted] *“any uses will be considered on their merits,”* is superfluous to decision making, and in this case especially, brings a level of ambiguity to a site policy that is based on very specific housing related exceptional circumstances. The phrase should be deleted from the policy.

[redacted] : ST FRIDESWIDE FARM

2029 -  
112.22 -  
MM81/  
SP25

[redacted]		Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

9.24 [redacted] that a ‘minimum’ housing figure – as introduced through MM81 – might [redacted] an edge will, in the future, go beyond the edge of the City’s authority area and it is unlikely that there will be an impact on landscape quality. The site has become, in effect, an infill opportunity.

2030 -  
112.23 -  
MM49/  
SP25

9.25 MM49 in this case is particularly concerning for the Trust. The exceptional circumstances to release [redacted] as: “*acute housing need, housing affordability and inequality*” in which [redacted] for the site would be acceptable. Whilst the Trust fully supports the [redacted] *“any permission will not be granted for any other uses,”* it is felt that [redacted] sites the new repeated phrase regarding “*other complementary uses*” creates a level of ambiguity that is unjustified and ineffective. It will not aid in efficient and consistent decision making.

9.26 [redacted] *“any uses will be considered on their merits,”* is superfluous to decision making, and in this case especially, brings a level of ambiguity to a site policy that is based on very specific housing related exceptional circumstances. The phrase should be deleted from the policy.

MM82 & MM49 – POLICY SP26: HILL VIEW FARM

2031 -  
112.24 -  
MM82/  
SP26

[redacted]		Positively prepared	Yes
[redacted]		Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

9.27 The Trust welcomes, and supports, the introduction – through MM82 – of an indicative dwelling capacity but questions whether it is appropriate in the setting of a Conservation Area or at the edge of the city on the urban / rural fringe to require a minimum figure of new homes. The heritage and landscape impacts of development could be a limiting factor that has not been fully considered.

2032 - 112.25 - MM49/SP26  
 9.29 MM49 in this case is particularly concerning for the Trust. The exceptional circumstances to release land from the Green Belt are cited as: “acute housing need, housing affordability and inequality” in which the Trust fully supports the proposal for the site would be acceptable. Whilst the Trust fully supports the proposal, planning permission will not be granted for any other uses,” it is felt that the Trust also remains concerned that there do not appear to be defensible and clearly identifiable boundaries for this site and also the adjacent site Hill View Farm. The Trust also remains concerned that there do not appear to be defensible and clearly identifiable boundaries for this site and also the adjacent site Hill View Farm. The Trust also remains concerned that there do not appear to be defensible and clearly identifiable boundaries for this site and also the adjacent site Hill View Farm. The Trust also remains concerned that there do not appear to be defensible and clearly identifiable boundaries for this site and also the adjacent site Hill View Farm.

**Suggested modification**

9.30 [Redacted] housing figure is described as ‘indicative’ or ‘approximate’ and that [Redacted] the setting of the designated heritage assets may have an impact on [Redacted] of compliance with policy DH3.

9.31 The phrase “*other complementary uses will be considered on their merits,*” is superfluous to decision making, and in this case especially, brings a level of ambiguity to a site policy that is based on very specific housing related exceptional circumstances. The phrase should be deleted from the policy.

2033 - 112.26 - MM83/SP27

[Redacted]: LAND WEST OF MILL LANE

[Redacted]		Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty	Yes	Effective	No
[Redacted]		Compliant with national policy	No

9.32 [Redacted] the introduction – through MM83 – of an indicative dwelling capacity but questions whether it is appropriate in the setting of a Conservation Area or at the edge of the city on the urban / rural fringe to require a minimum figure of new homes. The heritage and landscape impacts of development could be a limiting factor that has not been fully considered.

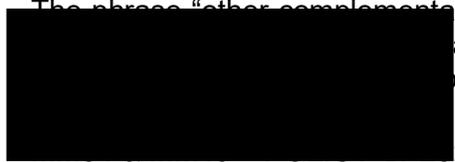
9.33 [Redacted] this policy retains its reference to a Conservation Area, where others [Redacted] firmly believes that it is appropriate and sound to refer to specific and [Redacted] in policies because it aids in the decision-making process and would [Redacted] all relevant site policies.

2034 - 112.27 - MM49/SP27  
 9.34 MM49 in this case is particularly concerning for the Trust. The exceptional circumstances to release land from the Green Belt are cited as: “acute housing need, housing affordability and inequality” in which the Trust fully supports the proposal for the site would be acceptable. Whilst the Trust fully supports the proposal, planning permission will not be granted for any other uses,” it is felt that the Trust also remains concerned that there do not appear to be defensible and clearly identifiable boundaries for this site and also the adjacent site Hill View Farm. The Trust also remains concerned that there do not appear to be defensible and clearly identifiable boundaries for this site and also the adjacent site Hill View Farm. The Trust also remains concerned that there do not appear to be defensible and clearly identifiable boundaries for this site and also the adjacent site Hill View Farm. The Trust also remains concerned that there do not appear to be defensible and clearly identifiable boundaries for this site and also the adjacent site Hill View Farm.

**Suggested modification**

9.36 The Trust suggests that the housing figure is described as ‘indicative’ or ‘approximate’ and that reference is made to the fact that the setting of the designated heritage assets may have an impact on development capacity, as a result of compliance with policy DH3.

9.37 The phrase “other complementary uses will be considered on their merits,” is superfluous to decision making, and in this case especially, brings a level of ambiguity to a site policy that is based on very specific housing related exceptional circumstances. The phrase should be deleted from the policy.



: PARK FARM

2035 -  
112.2  
8 -  
MM84  
/SP28

Legally compliant	Yes	Positively prepared	Yes
		Justified	No
		Effective	No
		Compliant with national policy	No

9.38 The Trust welcomes, and supports, the introduction – through MM84 – of an indicative dwelling capacity but questions whether it is appropriate at the edge of the city on the urban / rural fringe to require a [redacted] The landscape impacts of development could be a limiting factor that [redacted] and especially where there is reference in the policy’s supporting text to [redacted] *carefully within the landscape.*”



9.39 MM49 in this case is particularly concerning for the Trust. The exceptional circumstances to release land from the Green Belt are cited as: “acute housing need, housing affordability and inequality” in which case it is unlikely that other uses for the site would be acceptable. Whilst the Trust fully supports the removal of the phrase “Planning permission will not be granted for any other uses,” it is felt that [redacted] revisits the new repeated phrase regarding “other complementary uses” [redacted] is unjustified and ineffective. It will not aid in efficient and consistent [redacted]



2036 -  
112.29  
-  
MM49/  
SP28

**Suggested modification**

9.40 The Trust suggests that the housing figure is described as ‘indicative’ or ‘approximate’ and that [redacted] at the setting of the designated heritage assets may have an impact on [redacted] reference to the policy’s supporting text.



9.41 [redacted] y uses will be considered on their merits,” is superfluous to decision making, and in this case especially, brings a level of ambiguity to a site policy that is based on very specific housing related exceptional circumstances. The phrase should be deleted from the policy.



: PEAR TREE FARM

		Positively prepared	Yes
	No	Justified	No
	Yes	Effective	No



2037 -  
112.3  
0 -  
MM85  
/SP29

Compliant with the duty to cooperate		Compliant with national policy	No
--------------------------------------	--	--------------------------------	----

9.42 In this case the Trust considers that a 'minimum' housing figure – as introduced through MM85 – might be acceptable because the urban edge will, in the future, go beyond the edge of the City's authority area and it is unlikely that there will be an impact on landscape quality. The site has become, in effect,

[REDACTED]

2038 -  
112.31  
-  
MM49/  
SP29

9.43 [REDACTED] concerning for the Trust. The exceptional circumstances to release [REDACTED] as: "acute housing need, housing affordability and inequality" in which [REDACTED] for the site would be acceptable. Whilst the Trust fully supports the removal of the phrase "Planning permission will not be granted for any other uses," it is felt that especially on former Green Belt sites the new repeated phrase regarding "other complementary uses" creates a level of ambiguity that is unjustified and ineffective. It will not aid in efficient and consistent

[REDACTED]

9.44 The phrase "other complementary uses will be considered on their merits," is superfluous to decision making, and in this case especially, brings a level of ambiguity to a site policy that is based on very specific housing related exceptional circumstances. The phrase should be deleted from the policy.

[REDACTED]

LAND EAST OF REDBRIDGE PARK & RIDE

2039 -  
112.32  
-  
MM86/  
SP30

		Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty		Effective	No
		Compliant with national policy	No

9.45 [REDACTED] ts, the introduction – through MM86 – of an indicative dwelling capacity [REDACTED] but questions whether it is appropriate in the setting of an important view from Hinksey Hill or at the edge of the city on the urban / rural fringe to require a minimum figure of new homes. The heritage and landscape impacts of development could be a limiting factor that has not been fully considered.

[REDACTED]

2040 -  
112.33  
-  
MM49/

9.46 [REDACTED] concerning for the Trust. The exceptional circumstances to release [REDACTED] as: "acute housing need, housing affordability and inequality" in which [REDACTED] for the site would be acceptable. Whilst the Trust fully supports the [REDACTED] g permission will not be granted for any other uses," it is felt that especially on former Green Belt sites the new repeated phrase regarding "other complementary uses"

**Suggested modification**

[REDACTED]

9.47 [REDACTED] housing figure is described as 'indicative' or 'approximate' and that [REDACTED] t the setting of the designated heritage assets may have an impact on [REDACTED] lt of compliance with policy DH2.

9.48 The phrase “other complementary uses will be considered on their merits,” is superfluous to decision making, and in this case especially, brings a level of ambiguity to a site policy that is based on very specific housing related exceptional circumstances. The phrase should be deleted from the policy.

MM87 & MM53 – POLICY SP31: ST CATHERINE’S COLLEGE LAND

2041 -  
112.34 -  
MM87/  
SP31

		Positively prepared	Yes
		Justified	No
		Effective	No
to cooperate		Compliant with national policy	Yes

9.49 The Trust welcomes, and supports, the introduction – through MM87 – of an indicative dwelling capacity [redacted] appropriate in the setting of a Conservation Area and listed building to require [redacted]. The heritage impacts of development could be a limiting factor that [redacted] this limited factor is now proposed to be cross referred in the supporting [redacted] the policy.

2042 -  
112.35  
- MM53  
SP31

9.50 The Trust strongly objects to the removal of reference to the Conservation Area through MM53. The Trust firmly believes that it is appropriate and sound to refer to specific and local constraints in site [redacted] in the decision-making process and would prefer the reference [redacted].

9.51 The Trust suggests that the housing figure is described as ‘indicative’ or ‘approximate’ and that reference is made to the fact that the setting of the designated heritage assets may have an impact on [redacted] development capacity as a result of compliance with policy DH3.

9.52 [redacted] reference to heritage assets should be retained in the policy and should [redacted] to the special qualities of the Central Conservation Area and identify [redacted] buildings.

MM90 & MM53 – POLICY SP34: CANALSIDE LAND

		Positively prepared	Yes
		Justified	Yes
		Effective	No
Compliant with the duty to cooperate	Yes	Compliant with national policy	No

2043 -  
112.36  
- MM90/  
SP34

9.53 [redacted] the introduction – through MM90 – of an indicative dwelling capacity [redacted] appropriate in the setting of a Conservation Area and listed building to require [redacted]. The heritage impacts of development could be a limiting factor that [redacted] this limited factor is now proposed to be cross referred in the supporting [redacted] text, so it ought to be reflected in the policy.



2044 -  
112.37 -  
MM53/  
SP34

9.50 The Trust strongly objects to the removal of reference to the Conservation Area through MM53. The Trust firmly believes that it is appropriate and sound to refer to specific and local constraints in site allocation policies because it aids in the decision-making process and would prefer the reference remains in all relevant site policies. The Trust further notes that the site is within the historic core and has some concerns that development on this site may have an adverse effect on the views and as such suggests that reference to building heights and heritage setting is of value.

9.51 [REDACTED] housing figure is described as 'indicative' or 'approximate' and that [REDACTED] the setting of the designated heritage assets may have an impact on development capacity, as a result of compliance with policy DH3.

9.52 The Trust considers that the reference to heritage assets should be retained in the policy and should [REDACTED] to the special qualities of the Central Conservation Area and identify [REDACTED] settings, and the views of the skyline as follows:

[REDACTED] ensure that Development proposals must demonstrate how they will conserve and enhance the significance and setting contribute towards the character of the Central Conservation Area and enhance St Barnabas Church and its setting. This will include an assessment of heritage impact and a quality, carefully designed, development proposal.

[REDACTED] be granted for developments that demonstrate that they are capable of enhancing the significance and setting (including its green setting) of the Oxford's historic skyline, as appreciated within the city, outside it and [REDACTED] (in accordance with Policy DH2).

*A planning application must be accompanied by a site-specific assessment for flood risks...*

[REDACTED]: COURT PLACE GARDENS

[REDACTED]		Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty	Yes	Effective	No
[REDACTED]		Compliant with national policy	Yes

2045 -  
112.38 -  
MM67/  
SP35

9.53 [REDACTED] ts, the introduction – through MM67 – of an indicative dwelling capacity [REDACTED] appropriate in the setting of a Conservation Area and listed buildings to require a minimum figure of new homes. The heritage impacts of development could be a limiting factor that has not been fully considered. This limited factor is now proposed to be cross referred in the supporting text, so it ought to be reflected in the policy.

2046 -  
112.39 -  
MM53/  
SP35

9.50 [REDACTED] e removal of reference to the Conservation Area through MM53. The [REDACTED] appropriate and sound to refer to specific and local constraints in site [REDACTED] aids in the decision-making process and would prefer the reference [REDACTED] s. Trust notes that the site is surrounded by a number of other listed buildings and structures including the Grade 1 listed Norman Church and is adjacent to the Iffley Road



Conservation Area. These other heritage assets should be referenced in the policy to ensure its effectiveness.

**Suggested modification**

9.51 The Trust suggests that the housing figure is described as 'indicative' or 'approximate' and that reference is made to the fact that the setting of the designated heritage assets may have an impact on [redacted] of compliance with policy DH3.

9.52 [redacted] reference to heritage assets should be retained in the policy and should [redacted] to the special qualities of the Iffley Road Conservation Area and identify the setting of specific listed buildings as follows:

*Through the redevelopment of the site it must be demonstrated that the new design will have a [redacted] of the Grade II listed Court Place building compared to the existing [redacted] for the site should also demonstrate, as appropriate, conservation and [redacted] significance and setting of other nearby listed buildings including the Grade [redacted] adjacent Iffley Road Conservation Area.*

MM92 & MM53 – POLICY SP37: FACULTY OF MUSIC, ST ALDATES

2047 -  
112.40  
-  
MM92/  
SP37

[redacted]	Positively prepared	Yes
[redacted]	Justified	Yes
[redacted]	Effective	No
to cooperate	Compliant with national policy	No

9.53 The Trust [redacted] the introduction – through MM92 – of an indicative dwelling capacity [redacted] appropriate in the setting of a Conservation Area and listed buildings to [redacted] homes. The heritage impacts of development could be a limiting factor [redacted]. This limited factor is now proposed to be cross referred in the [redacted] reflected in the policy.

2048 -  
112.41  
-  
MM53/  
SP37

9.54 The Trust strongly objects to the removal of reference to the Conservation Area through MM53. The Trust firmly believes that it is appropriate and sound to refer to specific and local constraints in site [redacted] in the decision-making process and would prefer the reference [redacted]. Furthermore, the Trust notes that the site is within the historic core [redacted] in views from the west. It has some concerns that development on [redacted] effect on this setting and views and suggests that reference to building [redacted] heights and heritage setting is of value.

**Suggested modification**

9.55 [redacted] housing figure is described as 'indicative' or 'approximate' and that [redacted] the setting of the designated heritage assets may have an impact on [redacted] of compliance with policy DH3.

9.56 The Trust considers that the reference to heritage assets should be retained in the policy and should further include specific reference to the special qualities of the Central Conservation Area and identify the setting of specific listed buildings, and the views of the skyline as follows:

*Careful design must ensure that Development proposals must demonstrate how they will conserve and enhance the significance and setting contribute towards the character of the Central Conservation Area and enhance nearby listed buildings (in particular Christ Church) [redacted] will include an assessment of heritage impact and a quality, carefully [redacted] proposal.*

*[redacted] be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy DH2).*

IFFLEY MEAD PLAYING FIELDS

2049 -  
112.42 -  
MM94/  
SP39

[redacted]	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty	[redacted]	Effective	No
[redacted]	[redacted]	Compliant with national policy	Yes

9.57 [redacted]ts, the introduction – through MM94 – of an indicative dwelling capacity but questions whether it is appropriate in the setting of a Conservation Area to require a minimum figure of new homes. The heritage impacts of development could be a limiting factor that has not been fully considered.

9.60 [redacted]s appropriate and sound to refer to specific and local constraints in site [redacted]ids in the decision-making process and would prefer the reference [redacted]ces therefore, Iffley Road Conservation should be referenced in site

**Suggested modification**

9.61 [redacted]ousing figure is described as 'indicative' or 'approximate' and that [redacted]t the setting of the designated heritage assets may have an impact on [redacted]lt of compliance with policy DH3.

9.62 The Trust considers that the reference to heritage assets should be included in the policy and should further include specific reference to the special qualities of the Iffley Road Conservation Area the following text is a reasonable starting point:

[redacted]ould demonstrate, as appropriate, conservation and enhancement of [redacted]ng of the adjacent Iffley Road Conservation Area.

MM96 & MM95 – POLICY SP41: JESUS COLLEGE SPORTS GROUND



2050 -  
112.43/  
MM96/  
SP41

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

9.63 [REDACTED] ts, the introduction – through MM96 – of an indicative dwelling capacity [REDACTED] appropriate in the setting of a Conservation Area – especially the Bartlemas [REDACTED] for its relative rurality – and listed buildings to require a minimum [REDACTED] ge impacts of development could be a limiting factor that has not been fully considered. This limited factor is now proposed to be cross referred in the supporting text, so it ought to be reflected in the policy.

2051 -  
112.44  
-  
MM53/  
SP41

9.64 [REDACTED] e removal of reference to the Conservation Area through MM53. The [REDACTED] appropriate and sound to refer to specific and local constraints in site [REDACTED] ids in the decision-making process and would prefer the reference [REDACTED] es. This appears to have been deemed acceptable in the decision to retain reference to the Eye valley SSSI which is also referred in strategic policies RE4 and G2. The Trust is, however, pleased to note that potential for adverse effects on the views is suggested to be referenced in the supporting text, at least, but the Trust would prefer to see this in the policy as well.

9.65 [REDACTED] ousing figure is described as 'indicative' or 'approximate' and that [REDACTED] t the setting of the designated heritage assets may have an impact on development capacity, as a result of compliance with policy DH3.

9.66 The Trust considers that the reference to heritage assets should be retained in the policy and should [REDACTED] ce to the special qualities of the Bartlemas Conservation Area and [REDACTED] ed buildings, and the views of the skyline as follows:

*ensure that Development proposals must demonstrate how they will conserve and enhance the significance and setting contribute towards the character of the Bartlemas Conservation Area and preserve and enhance nearby listed buildings and their setting. This will include an assessment of heritage impact and a quality, carefully designed,*

*be granted for developments that demonstrate that they are capable [REDACTED] cing the significance and setting of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy DH2).*

*Development proposals should encourage active frontages onto Barracks Lane and the new [REDACTED] opment should be designed to ensure that there is no adverse impact*

[REDACTED] : LAND AT MEADOW LANE

Legally compliant	Yes	Positively prepared	Yes
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2052 -  
112.45

-  
MM98/  
SP43

Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

9.67 The Trust welcomes, and supports, the introduction – through MM98 – of an indicative dwelling capacity [redacted] appropriate, in the setting of the views of the Oxford skyline, to require a [redacted] The heritage impacts of development could be a limiting factor that has [redacted] limited factor is now proposed to be cross referred in the supporting [redacted] the policy.

2053 -  
112.4

6 -  
MM53  
/SP43

9.68 The Trust firmly believes that it is appropriate and sound to refer to specific and local constraints in site allocation policies because it aids in the decision-making process and would prefer the reference [redacted] The Trust is, however, pleased to note that potential for adverse [redacted] to be referenced in the supporting text, at least, but the Trust would [redacted] well.

9.69 The Trust suggests that the housing figure is described as 'indicative' or 'approximate' and that reference is made to the fact that the setting of the designated heritage assets may have an impact on [redacted] of compliance with policies DH2 and DH3.

9.70 [redacted] reference to heritage assets should be included in the policy to reflect [redacted] the specific reference to the views of the skyline as follows:

*Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the [redacted] Oxford's historic skyline, as appreciated within the city, outside it and [redacted] (in accordance with Policy DH2).*

[redacted]: LINCOLN COLLEGE SPORTS GROUND

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
		Effective	No
		Compliant with national policy	No

2054 -  
112.47 -

MM99/  
SP44

9.71 The Trust welcomes, and supports, the introduction – through MM99 – of an indicative dwelling capacity but questions whether it is appropriate in the setting of a Conservation Area – especially the Bartlemas CA which is specifically designated for its relative rurality – and listed buildings to require a minimum [redacted] large impacts of development could be a limiting factor that has not been [redacted] factor is now proposed to be cross referred in the supporting text, so it [redacted].

2055 -  
112.48 -

MM53/  
SP44

9.72 The Trust strongly objects to the removal of reference to the Conservation Area through MM53. The Trust firmly believes that it is appropriate and sound to refer to specific and local constraints in site allocation policies because it aids in the decision-making process and would prefer the reference [redacted]



remains in all relevant site policies. This appears to have been deemed acceptable in the decision to retain reference to the Lye Valley SSSI which is also referred in strategic policies RE4 and G2. The Trust is, however, pleased to note that potential for adverse effects on the views is suggested to be referenced in the supporting text, at least, but the Trust would prefer to see this in the policy as well.

**Suggested modification**

9.73 [REDACTED] housing figure is described as 'indicative' or 'approximate' and that [REDACTED] the setting of the designated heritage assets may have an impact on [REDACTED] of compliance with policy DH3.

9.74 The Trust considers that the reference to heritage assets should be retained in the policy and should further include specific reference to the special qualities of the Bartlemas Conservation Area and identify the setting of specific listed buildings, and the views of the skyline as follows:

[REDACTED]

*ensure that Development proposals must demonstrate how they will [REDACTED] the significance and setting contribute towards the character of the [REDACTED] Area and preserve and enhance nearby listed buildings and their setting. This will include an assessment of heritage impact and a quality, carefully designed, development proposal.*

[REDACTED]

*be granted for developments that demonstrate that they are capable [REDACTED] the significance and setting of the special significance of Oxford's [REDACTED] appreciated within the city, outside it and looking outwards from it (in [REDACTED] DH2).*

*Development proposals 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.*

[REDACTED] PLACE

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
[REDACTED]	[REDACTED]	Effective	No
[REDACTED]	[REDACTED]	Compliant with national policy	No

2056 -  
112.49  
-  
MM53/  
SP46

9.75 [REDACTED] the removal of reference to the Conservation Area through MM53. The Trust firmly believes that it is appropriate and sound to refer to specific and local constraints in site allocation policies because it aids in the decision-making process and would prefer the reference remains in all relevant site policies. This appears to have been deemed acceptable in the decision to [REDACTED] Lye Valley SSSI which is also referred in strategic policy G2. The Trust also [REDACTED] historic core and has some concerns that development on this site may [REDACTED] views and as such suggests that reference to building heights and [REDACTED]

**Suggested modification**

9.76 The Trust considers that the reference to heritage assets should be retained in the policy and should further include specific reference to the special qualities of the Central Conservation Area and identify the setting of specific listed buildings, and the views of the skyline as follows:

~~Careful design must ensure that Development proposals must demonstrate how they will conserve and enhance the significance and setting contribute towards the character of the Central Conservation Area and preserve and enhance nearby listed buildings and their setting. Assessment of heritage impact and a quality, carefully designed,~~



~~be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy DH2).~~



9: OLD POWER STATION

Legacy compliance	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty		Effective	No
		Compliant with national policy	No



that development on this site may have an adverse effect a range of heritage assets and on the views and as such suggests that reference to building heights and heritage setting is of value. The Trust acknowledges that through MM53 the supporting text now references policies DH3 and DH5, but DH2 ought to be added as the view will be affected.

9.78 ~~that the current proposals for the site represent an over intensification of significant adverse impacts on the Conservation Areas and the views of particular value to cite an indicate development capacity through development is such a sensitive matter and solutions to constraints can be identified at an earlier stage if all parties know what might be achievable on the site.~~

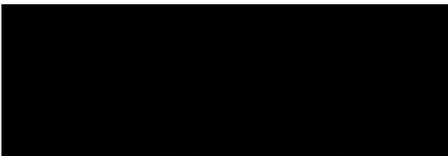


***Suggested modification***



9.79 ~~indicative' or 'approximate' development figure is described and that the setting of the designated heritage assets may have an impact on the level of compliance with policy DH3.~~

9.80 The Trust considers that the reference to heritage assets should be retained in the policy and should further include specific reference to the special qualities of the Osney Island and Central Conservation Area and identify specific listed buildings, and the views of the skyline as follows:



~~ensure that Development proposals must demonstrate how they will preserve and enhance the significance and setting of the Osney Island and Central Conservation Areas and reflect the heritage significance of the buildings and their setting. This~~

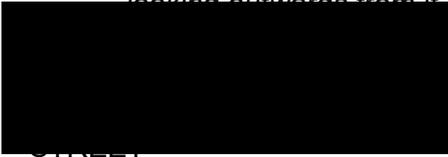
2058 -  
112.51 -  
MM53/  
SP49

2057 -  
112.50  
-  
MM104/  
SP49



will include an assessment of heritage impact and a quality, carefully designed, development proposal.

Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy DH2).



0: ORIEL COLLEGE LAND AT KING EDWARD STREET AND HIGH

2059 - 112.52 - MM105/ SP50	Legally compliant	Yes	Positively prepared	Yes
			Justified	Yes
			Effective	No
			Compliant with national policy	No

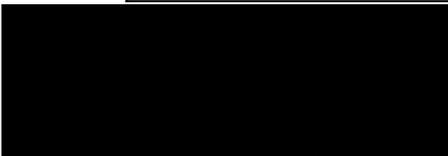
9.81 The Trust welcomes, and supports, the introduction – through MM105 – of an indicative dwelling capacity but questions whether it is appropriate, in the setting of a Conservation Area and the significant [redacted] require a minimum figure of new homes. The heritage impacts of [redacted] factor that has not been fully considered.

9.82 [redacted] is appropriate and sound to refer to specific and local constraints in site allocation policies because it aids in the decision-making process and would prefer the reference remains in all relevant site policies therefore, the Central Conservation should be referenced in site policy. Furthermore, the Trust notes that the site is within the historic core and has some concerns that [redacted] have an adverse effect on the views and as such suggests that reference [redacted] setting is of value.

9.83 The Trust suggests that an 'indicative' or 'approximate' development figure is described and that reference is made to the fact that the setting of the designated heritage assets may have an impact on development capacity, as a result of compliance with policy DH3.

9.84 [redacted] reference to heritage assets should be retained in the policy and should [redacted] to the special qualities of the Central Conservation Area and identify [redacted] settings, and the views of the skyline as follows:

Careful design must ensure that Development proposals must demonstrate how they will preserve and enhance the significance and setting of the Central Conservation Area and [redacted] and its setting. This will include an assessment of heritage impact [redacted] designed, development proposal.



Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy DH2).



MM106 & MM53 – POLICY SP51: OXFORD BROOKES UNIVERSITY MARSTON ROAD CAMPUS

2061 -  
112.54  
-  
MM106  
/51

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
		Effective	No
		Compliant with national policy	Yes

9.85 [REDACTED] supports, the introduction – through MM106 – of an indicative dwelling capacity but questions whether it is appropriate, in the setting of a Conservation Area and the views of the Oxford skyline, to require a minimum figure of new homes. The heritage impacts of development could be a limiting factor that has not been fully considered. This limited factor is now proposed to be [REDACTED] text, so it ought to be reflected in the policy.

9.86 [REDACTED] is appropriate and sound to refer to specific and local constraints in site [REDACTED] in the decision-making process and would prefer the reference remains in all relevant site policies. The Trust is, however, pleased to note that potential for adverse effects on the views is suggested to be referenced in the supporting text, at least, but the Trust would prefer to see this in the policy as well.

2062 -  
112.5  
5 -  
MM53  
/SP51

9.87 [REDACTED] housing figure is described as 'indicative' or 'approximate' and that reference is made to the fact that the setting of the designated heritage assets may have an impact on development capacity, as a result of compliance with policies DH2 and DH3.

9.88 The Trust also suggests that reference to heritage assets should be included in the policy to reflect [REDACTED] the specific reference to the views of the skyline as follows:

[REDACTED] could demonstrate, as appropriate, conservation and enhancement of [REDACTED] of the adjacent Headington Hill Conservation Area.

*Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the [REDACTED] Oxford's historic skyline, as appreciated within the city, outside it and [REDACTED] (in accordance with Policy DH2).*

[REDACTED] RIFFE OBSERVATORY QUARTER

Legally compliant	Yes	Positively prepared	Yes
		Justified	Yes
		Effective	No
		Compliant with national policy	No

2071 -  
112.58 -  
MM53/  
SP55

9.89 The Trust strongly objects to the removal of reference to the Conservation Area through MM53. The Trust firmly believes that it is appropriate and sound to refer to specific and local constraints in site

allocation policies because it aids in the decision-making process and would prefer the reference remains in all relevant site policies. The Trust notes that, the site is within the historic core, and has some concerns that development on this site may have an adverse effect on the views and as such suggests that reference to building heights and heritage setting is of value. The Trust further suggests that potential for adverse effects on the views is suggested to be referenced in the supporting text, at least, but the Trust would prefer to see this in the policy as well.

9.90 [REDACTED] as proposed, should include reference to DH2 but further to that the [REDACTED] reference to heritage assets should be included in the policy to reflect MM53 and should further include specific reference to the views of the skyline as follows:

*Careful design must ensure that Development proposals must demonstrate how they will [REDACTED] the significance and setting of the Central Conservation Area and [REDACTED] and its setting. This will include an assessment of heritage impact [REDACTED] designed, development proposal.*

*Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and [REDACTED] (in accordance with Policy DH2).*

OXFORD COLLEGE CAMPUS

2063 -  
112.5  
6 -  
MM53  
/SP56

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
[REDACTED]	[REDACTED]	Effective	No
[REDACTED]	[REDACTED]	Compliant with national policy	No

9.91 [REDACTED] the removal of reference to the Conservation Area through MM53. The Trust firmly believes that it is appropriate and sound to refer to specific and local constraints in site allocation policies because it aids in the decision-making process and would prefer the reference remains in all relevant site policies. The Trust notes that, the site is within the historic core, and has [REDACTED] on this site may have an adverse effect on the views and as such [REDACTED] heights and heritage setting is of value. The Trust further suggests [REDACTED] on the views is suggested to be referenced in the supporting text, at [REDACTED] to see this in the policy as well.

9.92 The Trust also considers it important that the impact of the development of this site should be considered in combination with the adjacent site (SP57: Ruskin Field) to ensure that the cumulative [REDACTED] fully understood and mitigated a necessary.

9.93 The Trust suggests that [REDACTED], as proposed, should include reference to DH2 but further to that the Trust also suggests that reference to heritage assets should be included in the policy to reflect MM53 and should further include specific reference to the views of the skyline as follows:



~~Development must retain and enhance the setting of the listed building and wall. Careful design must ensure that Development proposals must demonstrate how they will preserve and enhance the significance and setting contribute towards the character of the Old Headington Conservation Area and enhance the listed buildings and structures (in particular the listed Rookery and wall) and its setting. This will include an assessment of heritage impact and a quality, carefully designed, development proposal.~~

[Redacted]

~~be granted for developments that demonstrate that they are capable of enhancing the significance and setting (including its green setting) of the Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy DH2).~~

MM53 – POLICY SP57: RUSKIN FIELD

2064 -  
112.57  
-  
MM53/  
SP57

[Redacted]

		Positively prepared	Yes
		Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

9.94 [Redacted] the removal of reference to the Conservation Area through MM53. The [Redacted] appropriate and sound to refer to specific and local constraints in site [Redacted] aids in the decision-making process and would prefer the reference remains in all relevant site policies. The Trust notes that, the site is within the historic core, and has some concerns that development on this site may have an adverse effect on the views and as such suggests that reference to building heights and heritage setting is of value. The Trust further suggests that potential for adverse effects on the views is suggested to be referenced in the supporting text, at [Redacted] to see this in the policy as well.

9.95 [Redacted] important that the impact of the development of this site should be [Redacted] the adjacent site (SP56: Ruskin College Campus) to ensure that the cumulative effects of the two sites can be fully understood and mitigated a necessary.

**Suggested modification**

9.96 [Redacted] as proposed, should include reference to DH2 but further to that the [Redacted] ce to heritage assets should be included in the policy to reflect MM53 [Redacted] fic reference to the views of the skyline as follows:

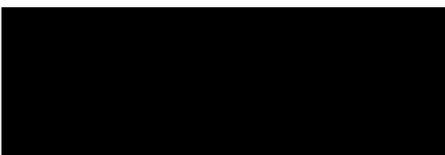
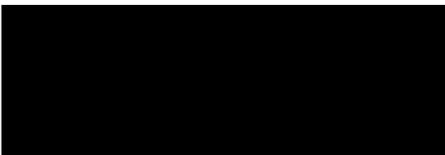
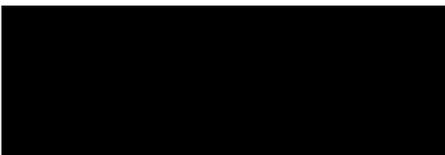
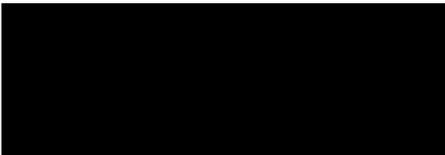
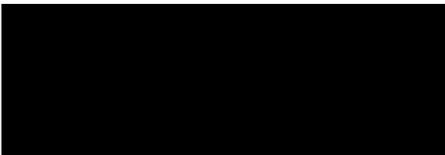
~~New development should be informed by the landscape character and potential impact on views from the north in terms of choice of siting, height, form and appearance. Careful design must [Redacted] proposals contribute towards the character of the conservation area [Redacted] ce nearby listed buildings and their setting.~~

[Redacted]

~~must demonstrate how they will preserve and enhance the significance and setting of the Old Headington Conservation Area and listed buildings. This will include an assessment of heritage impact and a quality, carefully designed, development proposal.~~



Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy DH2).



**10.0 CONCLUSION**

10.1 Oxford Preservation Trust considers that the Local Plan is unsound as proposed to be modified. This is explained through the detailed submissions and suggestions have been made as to how the plan should be modified.

[Redacted] are useful to the City Council and Inspectors. I confirm that I am happy for my name, address and postcode to be published alongside my comments at [Redacted] in accordance with GDPR regulations.

Please also keep me informed of the progress of the plan up to and including adoption.

Yours Faithfully,

[Redacted Signature]

Debbie Dance

[Redacted Address Line 1]

[Redacted Address Line 2]

[Redacted Address Line 3]

[Redacted Address Line 4]

