Chapter 1 - Introduction and Strategy

Contents

Headlines for Chapter 1:

- Strong public voice for provision of more housing which should have adequate infrastructure to support development
- Any developments should be designed to the highest quality and sensitive to the historic environment
- General concern that the amount of development will put a strain on infrastructure, services, and amenities; such as transport, water and sewage, GPs, schools, green spaces, shops etc
- Infrastructure improvements should come before development, not after
- Concern about more cars and pressures on the roads as it's too expensive for people to live so they commute
- Concern that developers can dodge provision of affordable housing too easily through claiming lack of viability
- Some preference for lifting vast majority of regulations on building to allow for more development

- Desire for the Plan to actively address inequalities through tools like citizens assembles, collaboration with community organisations, stronger mention of community-led and cooperative housing and neighbourhood plans
- Mansfield College, Worcester College and Lincoln College express support for the Chapter

All Public Responses – Draft Policy S1

Draft Policy	Topic	Summary	Response
S1	Support	We support policies S1-S3 and particularly welcome the commitments in policy S1 Spatial strategy to prevent new development in locations where it would have a negative impact on green infrastructure and take account of local historic context.	Support noted.
S1	What protection is there for green space outside f)	BBOWT supports S1 f) but asks what counts as "important". What protection is there for green spaces that are not deemed important nor are they public open space nor floodplain?	The detailed approach to protecting GI is set out in Policy G1.
S1	Support but policy should be split in two	We support the general approach to the spatial strategy of the local plan and the aim to ensure that development within the City is located in the right places. Support the City's ambition to address as much of its housing needs within the city boundary as possible, however, this should not come at the expense of the economic potential of development sites such as Oxford North. However, ONV remains of the opinion that the policy should be split into two, one setting out the spatial strategy and a second policy setting out the presumption in favour of sustainable development. Following withdrawal of the Oxford Local Plan 2040 there remains the need for co-operation between Oxford and the surrounding authorities to ensure that the approach to meeting the unmet housing need is agreed. While it is acknowledged that the consultation version of the plan does increase the amount of housing to be provided within the plan period there remains a level of housing still to be provided outside of the boundaries of the city.	The general support is welcomed. S1 as a whole deals with the spatial strategy, so there is no obvious advantage to splitting it. The Plan does not attempt to address housing need at the expense of existing employment sites, which it encourages intensification of.
S1	Templars Square	The redevelopment of Templars Square would make a significant contribution to meeting the aims of Policy S1/ the development proposals should be viewed as one of the most strategically opportunities for the city in terms of its ability to address and	Noted.

Draft Policy	Topic	Summary	Response
		positively contribute to the aims and objectives of the emerging Local Plan.	
S1	Change of use	We support this policy in principle. Whilst the general aims of sustainable development and growth in terms of the delivery of homes, jobs and services are positive, a strategic approach is needed to achieve these aims. This policy touches on a number of key themes without identifying opportunities for growth. We would like to see this policy set out the council's stance in favour of applications for the change of use from commercial to residential within city and district centres. Promoting development of this type would achieve a number of the aims set out in Draft Policy S1. We would also support a policy outlining sanctions against the keeping of vacant units, both residential and commercial, within city and district centres. The repopulation or urban centres will have a significant impact on housing need, preventing the further development of Oxford's green setting.	The support in principle is welcomed. The policy approach for employment sites is only to protect the very largest few in the city and district centres. Most employment sites in these locations are not protected. The Local Plan cannot set a policy with sanctions against vacant buildings.
S1 Spatial strategy		Capacity based approach must be flexible to a) Allow sites of all sizes that meet the presumption in favour of sustainable development to be allocated with the draft Plan; b) Allow sites of all sizes that are not allocated in the draft Plan, to come forward through the Development Management process (planning applications) where they meet the presumption in favour of sustainable development. It is also imperative that there are no restrictions on small sites coming forward through planning applications which support small and medium sized housebuilders. Those SME housebuilders will play a crucial role in delivering the new homes that the country is desperately in need of.	Not every site needs to be allocated. Small sites do not need an allocation policy as there is unlikely to be anything site-specific it would need to cover. However, small sites are not in any way prevented from coming forward, and they are factored into the assumed capacity of the city through application of a windfall forecast.
S1 Spatial strategy	Oxford unmet housing need	The policy outlines how Oxford's development needs will be met but doesn't address the role of neighbouring local authorities in	Policy H1 outlines the housing requirement and unmet housing

Draft Policy	Topic	Summary	Response
		this process. Since Oxford's city boundaries have limited capacity, a significant part of its future housing and employment demands must be met in adjoining areas. The existing plan acknowledges this but relies on a regional strategy that has not progressed. Therefore, a new, agreed-upon approach is needed to address Oxford's unmet housing needs collaboratively. The plan should be bold enough to state that if growth ambitions are to be met in full, cross boundary joint working will be necessary with neighbouring authorities to consider how additional unmet needs can be met.	need is referred to. A formal request has been made of our neighbouring authorities for helping meeting unmet need, and duty to cooperate engagement is ongoing.
S1	SA of spatial strategy	Hallam is concerned that the Spatial Strategy has not been presented as a preferred option alongside any alternatives in the consultation. We can only look to the Sustainability Appraisal in this regard and the growth strategy for the Local Plan where six alternatives have been presented upon which the preferred option is based - a balance between providing for housing and employment land needs whilst delivering on wider local plan objectives. The Spatial Strategy must also be able to express more spatially where growth can be focussed. To some degree the plan sets out Areas of Focus and this could be reflected in the Spatial Strategy.	The SA and six alternatives for the growth strategy show that various options were considered.
S1	Proposed amendment	Minor change proposed to better reflect the duty on decision makers set out under S38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) to have regard to the Development Plan as a whole… Proposed amendment: *"Planning permission will be granted where development proposals accord with the policies of the Plan <u>taken as a whole</u>."*	Amendment made.

Draft Policy	Topic	Summary	Response
S1	Proposed amendment/ modification	Move all text contained within Policy S1 to the supporting text. Policy is **Ineffective** as it is mostly aspirational. It allows any development anywhere providing it meets the criteria. It not a policy but a fluffy wish-list. ALL development will generally be a net negative for resident amenity even if it has positives such a housing provision.	Providing criteria to achieve is not considered to be merely aspirational.
S1	Comment – proposed amendment	This new policy should set out a Spatial Strategy for meeting the vision and objectives of the Plan referring to the need to maximise housing delivery in Oxford. The Spatial Strategy should also set out how the proposed development is to be delivered over the plan period and beyond. The Spatial Strategy should follow the approach in the extant Local Plan (i.e. maximising growth in the City and then adopt a hub and spokes approach, with the City being the focus for education, tourism and employment but having good infrastructure links into the surrounding Districts where housing is more readily deliverable). The wording of the Spatial Strategy should fulfil the role of the LP42 and respond to challenges which include "national and international pressures such as rising build costs for new development, a chronic undersupply of housing, climate change and energy insecurity". And to "build upon the positive aspects that make the city so special, whilst also seeking to address the challenges we face through positive planning policies to ensure the optimum outcomes for the environment and its residents, businesses, education, and health institutions". In terms of addressing the undersupply of housing, the wording of the new Spatial Strategy should be similar to the adopted Local Plan 2036 which acknowledged that "addressing the housing issue is a key priority…". The locational text in Chapter 8 of LP42 which is more	The spatial strategy does refer to sustainable locations. The described spatial strategy with spokes into the districts sounds like work that was done as part of the Oxfordshire Plan, which was never completed. It is beyond the scope of the Oxford Local Plan.

Draft Policy	Topic	Summary	Response
		akin to a spatial strategy should also be reflected in the Spatial Strategy, to focus delivery in sustainable locations. The Spatial Strategy should also respond to the importance of Oxford's location, "Oxford is also highly sustainable location for employment in Oxfordshire and the southeast. Enhancements could be made to the already sustainable transport system to take people to jobs here rather than if employment is scattered to less sustainable locations. A concentration of employment in a sustainable location is better than dispersed employment relying on the private car. In particular, the city's economy is shaped by the presence of its two successful universities". Without a clear spatial strategy the LP42 is unsound as it is not positively prepared, effective or justified.	
S1&S2		Cyclox support these policies	Support noted.

Statutory Consultee Responses – Draft Policy S1

Oxford County Council

Topic	Summary of comments	Response
Policy S1 needs to be sufficiently flexible to ensure appropriate developments, e.g., demolishing old buildings and replacing them with new housing, can be found to be compliant with policy, providing there is clear environmental justification as to why their reuse is not feasible/viable.	Policy S1 provides the plan's over-arching strategy. Other policies specifically deal with the reuse of buildings.	No action required. Resolved.
Oxfordshire County Council seeks that the effects of development are mitigated through appropriate conditions, works and contributions to infrastructure.	Noted.	No action required. Resolved.

Topic	Summary of comments	Response
We expect to agree S106 contributions and S278 works in respect of development envisaged in this Local Plan, as well as agreeing the use of Community Infrastructure Levy (CIL) receipts for some infrastructure needs.	Policy S3 sets out more information about S106, S278 and CIL.	No action required. Resolved.

All Public Responses – Draft Policy S2

Draft Policy	Topic	Summary	Outcome
S2	Clarification	We support the reference to the "..wider townscape and landscape" within this policy. We feel that the supporting text could include more detailed information on what this means, and could also include specific reference to the wider green setting of the city. It is also pleasing to see that the supporting guidance in Appendix 1.1 highlights the issue of important views across the city and how these can be both views from the outskirts in towards the historic centre, and those that are from the centre looking out towards the green hills which surround the city.	Support is welcomed. That part of the policy wording will be amended for clarity.
S2	Policy should mention high quality architecture	While we support the general aims of the policy, it does not mention any preference for high quality architecture within the city centre. In a city filled with rich examples of internationally significant architecture, we would like to see the council's stance in favour of supporting examples of high quality architecture within the city centre set out clearly in policy.	This is a strategic policy that addresses specifically the approach in the plan towards design guidance. The plan includes a policy that addresses high quality design (policy HD7), and other policies that affect placemaking such as green spaces (G1, G2, G3), historic environments (HD1, HD2).
S2	Weighting of local design	Draft Policy S2 (Design Code and Guidance) makes reference to development proposals referring to and aligning with the design principles set out in the Botley Road Retail Park Development Brief	Any design guidance will be produced to be in accordance with the policies of the plan. As

Draft Policy	Topic	Summary	Outcome
	codes and design briefs	2022. On adoption, the policies contained within the new Local Plan will carry greater weight in decision making on account of the Local Plan being more up to date than the Development Brief and the nature of the Development Brief being guidance only. This policy weighting should be acknowledged within draft Policy S2 for the avoidance of doubt.	they are not statutory documents they can be amended or updated as technical documents to be in line with the extant local plan policies. Their weighting will be set out in the policy supporting text.
S2	Strengthen design checklist	we consider that this policy and the design checklist at appendix 1.1 could be strengthened. A common complaint across communities is the banality of much new housing development, dissatisfaction with design quality, and frustration with design that is not in keeping with the existing built environment. It is our experience that communities wish to positively influence the design of new housing, ensure that heritage considerations are thoughtfully and pragmatically balanced with quality contemporary design, and achieve design that responds positively to the local context. These straightforward but positively impactful aspirations could be strengthened in Local Plan policy. Larger developments should include a requirement to establish a forum comprised of local organisations/ residents who can have proper input into the design of new developments on an equal footing with other statutory consultees. Such an approach has been shown to lead to developments being more integrated into the current local community and lead to better social and health outcomes for the new residents.	Developers are encouraged to engage with planning officers at the earliest possible stage so that any concerns are identified at the earliest opportunity, and engagement with the local community is also good practice particularly for major schemes. There is a basis for this in national policy and is set out in the City Council's Statement of Community Involvement.

Draft Policy	Topic	Summary	Outcome
S2	Local Heritage Assets Design Guidance 'Positive strategy' Modifications	• The following policy is muddled as statutory duties are as below anyway, and implies English Heritage listed assets will not be protected. Final paragraph of the policy states: *In recognition of the significance of Oxford's heritage, and as part of its positive approach to the historic environment, in addition to fulfilling its statutory duties, the Council will:* *a) identify, conserve and enhance local heritage assets* • Design guidance is not a material consideration unless backed up with an Article 4 restriction. • Bullet point d) of the final paragraph makes reference to a 'positive strategy' in the context of heritage assets at risk. The respondent asks "what is a positive strategy? It is simply waffle. • Whole policy needs to be moved to supporting text. • The word *should,* needs to be replaced with *must*, for the policy to be effective.	• This refers to heritage assets on the local list, which do not have statutory designation. • An Article 4 direction are not required for local design guidance to be a material consideration. • This refers to an approach of proactive engagement with landowners to support and encourage them to explore options for safeguarding the future of heritage assets at risk. Where relevant developers will also be encouraged to consider how their schemes may enhance the setting of such heritage assets or directly contribute to the safeguarding of their future.

Draft Policy	Topic	Summary	Outcome
S2	Support + clarification sought	The inclusion of a Design Checklist at Appendix 1.1 is supported. The reference in the Appendix to the Design Code document should be clarified in terms of whether reference is being made to the National Model Design Code.	Comment noted.

Statutory Consultee Responses – Draft Policy S2

Historic England

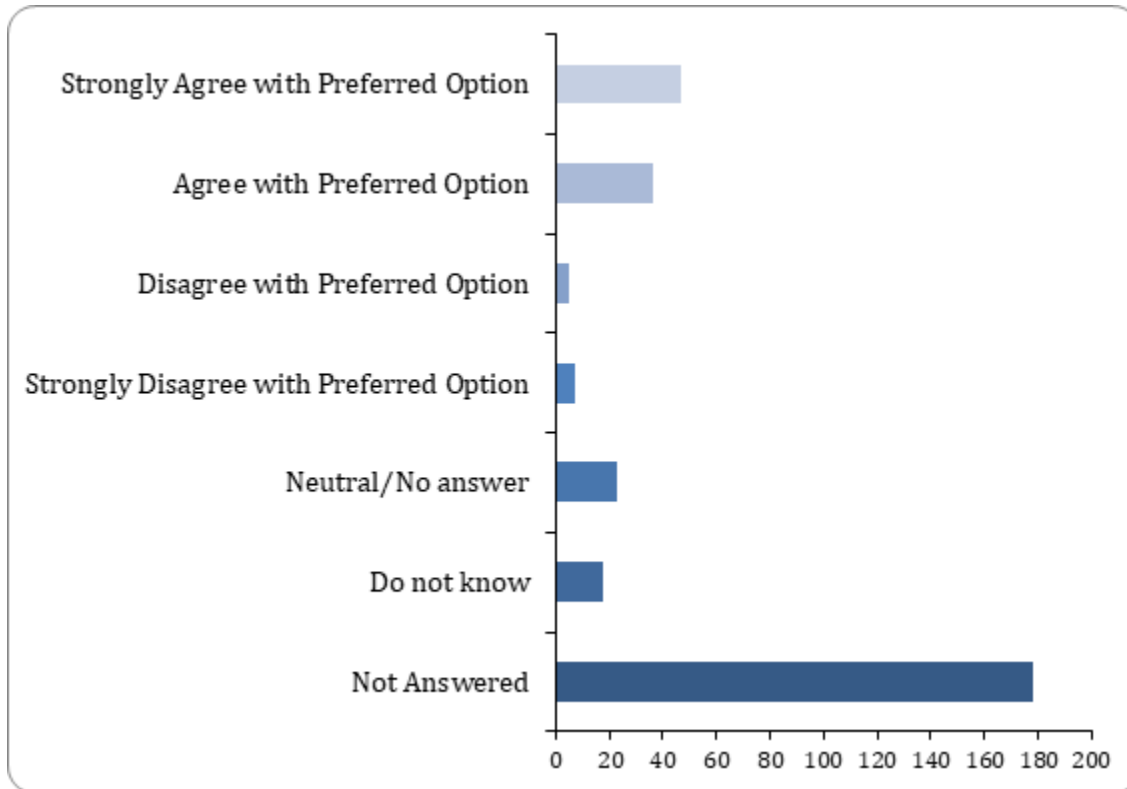| Draft Policy	Summary	Response	Outcome
S2	Current title does not reflect the content of the policy. Suggest review, and also consider what a strategic policy on the historic environment should contain and whether policy content needs further update. One topic that could usefully be integrated is promoting opportunities for heritage-led regeneration. Hope the supporting text on heritage at risk from LP2040 Statement of Common Ground (SoCG) can be integrated into the final supporting text.	We agree the title could be changed to be more reflective of the policy. We will also have a think about the additional point and are happy to discuss further through statement of common ground where necessary.	Policy title updated. Council will give further thought to other suggestion re: heritage-led regeneration

Oxfordshire County Council

Topic	Summary of comments	Response
Landscape & Nature Recovery – Landscape		

Topic	Summary of comments	Response
Recommend that the policy and/ or design code includes reference to GI and the requirement to protect existing trees and hedgerows.	Design Checklist sections N1-N4 cover GI. Existing trees/ hedgerows are protected via other policies in the plan.	No action required.
Support design checklist at Appendix 1. It includes a lot of text making it not easy to use. Should consider if the checklist can be presented in more user-friendly way (e.g. more visualisation, interactive methods, etc.). It is not clear what applicants need to submit, or how compliance with the design code will be assessed.	Policy HD7 sets out that the design checklist could be included with a Design and Access Statement submitted alongside a planning application. No change proposed.	No action required.
Innovation Supporting text for Policy S2 should reference the Innovation Framework (available online as part of LTCP. The Innovation Framework requires an Innovation Plan to be produced. This is a mechanism for developers to comprehensively consider the need for innovation and futureproofing in the pre-planning stages of major new developments.	Having reviewed the Innovation Framework, it seems to apply more to infrastructure projects and is already supporting strategy for the LTCP.	No action required.
Urban Design (Placemaking) Require the inclusion of a reference "to carry out work with other local authorities and districts (where applicable) on producing and promoting use of other guidance – e.g., Oxfordshire Street Design Code (currently under development).	The Local Plan includes policy requirements to guide development in the city. As such, the inclusion of such a reference in the plan is not appropriate. We will continue to work with county colleagues to develop any relevant guidance.	No action required.

All Public Responses – Draft Policy S3

Please tell us what you think about policy options set 014a (draft Policy S3): Infrastructure Delivery in New Development .

There were 136 responses to this part of the question.

Option	Total	Percent
Strongly Agree with Preferred Option	47	14.97%
Agree with Preferred Option	36	11.46%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	23	7.32%
Do not know	18	5.73%
Not Answered	178	56.69%

Draft Policy	Topic	Summary	Response
S3	Strengthen social infrastructure element of policy	Community First considers that the themes of social infrastructure and community development could be significantly strengthened. To help achieve thriving, sustainable communities it is vital to set out expectations and enable locally-specific strategies to support long-term, on the ground community development support to support the process of new community formation, extend and deepen social and community infrastructure, and build bridges between existing and new residents. DRAFT POLICY S3: INFRASTRUCTURE DELIVERY IN NEW DEVELOPMENT sets out a range of expectations with regard to the provision of physical infrastructure. This policy would be strengthened by including an additional paragraph which considers social infrastructure, for example: *Where appropriate, in relation to the type, size, and scale of a development proposal, developers will be expected to engage early with the Council in order to identify and make to make sufficient provision to support site specific community development activity.*	This is an over-arching infrastructure policy which is supported by the Infrastructure Delivery Plan (IDP). While certain key physical infrastructure projects are referenced in the policy, the policy itself applies to all infrastructure – physical, social, green, etc. The IDP includes a schedule of projects to support planned growth over the plan period. Social infrastructure projects are included within the IDP. There is no need to explicitly reference social infrastructure in this policy as it is covered under the umbrella term of infrastructure.
S3	A more flexible approach suggested.	The infrastructure needs and delivery of an industrial site will differ from residential or mixed-use developments. A more flexible approach that allows for phased delivery would be welcomed.	Paragraph 3 of Policy S3 already includes some wording to ensure that infrastructure improvements are delivered "at a rate and scale to meet the needs that arise from that development or a phase of that development"

Draft Policy	Topic	Summary	Response
S3	More engagement with all stakeholders	Developers should engage with local active travel stakeholders (e.g. Coalition for Healthy Streets and Active Travel, Oxford Pedestrian Association).	See response in box below
		Oxford railway station should become a central transport hub, incorporating a nearby bus and coach station.	See response in box below
		Beckett Street car park is the preferred location for this hub due to its proximity and ownership.	See response in box below
		Urgent consideration needed before finalising housing/employment plans.	Noted
		Relocating the bus station from George Street is key to enabling a high-quality east-west cycle route through the city centre.	Noted
S3	Support for policy, with suggested amendments	Add: Engage with transport stakeholders to understand network opportunities pre-masterplan, to get the best results and avoid potential problems such as cutting off existing or future active travel routes. We specifically suggest that CoHSAT is engaged in any Major Development to identify opportunities or challenges.

Change 'rail and bus' to 'rail, bus, active travel and links between these networks'. | The policy itself does not make reference to specific stakeholders as it is intended as an over-arching holistic policy which guides applicants to engage with appropriate/ relevant stakeholders. While active travel measures are supported through the IDP, these are usually delivered through developer contributions (e.g., S106/ S278 agreements. Whereas the policy states "Proposals to enhance the city's rail and bus network will be supported" relates to a much |

Draft Policy	Topic	Summary	Response
			broader suite of infrastructure, some which may require planning permission.
		The transformation of Oxford railway station should include a new fit-for purpose bus and coach station located close to the railway station, and a site should be allocated for this in the current Beckett Street car park.	The policy requirements for Oxford Railway Station/ Becket St car park will be set out in bespoke site allocation policy and any wider infrastructure requirements included within an Area of Focus Policy for the West End/ Botley Road. Neither of these policies include reference to a new bus/coach station. No changes are proposed.
S3	Infrastructure led regeneration	Network Rail welcome the preferred option for Policy S3 which outlines support for proposals that can enhance the city's rail and bus network, including Cowley Branch Line and Oxford Railway Station.

However, redevelopment of Oxford Station is expected to act as a catalyst for economic regeneration, attracting investment and supporting new employment in and around the station area. The Local Plan should recognise the strategic importance of infrastructure-led regeneration in supporting the local economy. | Support noted.

We can consider whether to incorporate these issues within Area of Focus/ Site allocation policies. |
| S3 | CBL Buffer Zone | The inclusion of text relating to the proposed CBL buffer zone is not enforceable. It does not wholly and exclusively relate to the development and would not be justified, (especially for householder applications). BMW for example (at the end of the | The CBL buffer zone area is the area where financial contributions from *new* trip generating development will be *expected. (emphasis added)*. |

Draft Policy	Topic	Summary	Response
	Modification/ amendment	line) may benefit but so might others who use it as a transit point to go to Oxford Central. Remove the following text: *Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL [Cowley Branch Line] stations will be expected"* Unless there is a clear relationship between the proposed development. Contributions to CIL should be provided by city-wide CIL	Developer contributions are not sought from householder applications. CIL applies to minor and major developments in Oxford, while any financial contributions collected through this policy would be through the S106 process. The City Council already as a CIL charging authority already has a CIL tariff in place. The text also includes reference to the paragraph in the NPPF that sets out the tests for developer contributions (para 58 NPPF, Dec 2024). No changes are proposed.
S3	Infrastructure Delivery Plan	A clear, up-front rule that links schemes to an up-to-date Infrastructure Delivery Plan is preferable to ad-hoc negotiations: it gives landowners price certainty, speeds decisions and ensures that roads, bus priority, fibre and drainage scale in step with new homes and labs. The key, however, is to keep the IDP lean and regularly refreshed—no sprawling wish-list that becomes an open-ended tax. Contributions should default to a transparent, per-unit CIL/Section 106 tariff, with viability testing only for genuinely abnormal sites, and there must be scope to swap listed projects if evidence shows a higher-yield use of funds (e.g. bus lanes	The IDP is a 'live' document and is usually updated on an annual basis. Preferred Option Selected for reasons set out in Background Paper

Draft Policy	Topic	Summary	Response
		outranking public-art budgets). In short, the policy should secure essential enabling infrastructure without piling unpredictable, scheme-killing costs onto the very development Oxford needs to stay dynamic and affordable.	
S3	Timing of Infrastructure delivery	An emphasis on appropriate timing of infrastructure requirements would be useful- i.e., do not leave it till the end of the project.	Policy S3 recognises the importance of delivering infrastructure in a timely manner.
S3		I feel it is essential that new developments contribute to local infrastructure, but it would be good to see details of how this would be drawn up and enforced.	The IDP sets out the infrastructure required to support the delivery of the local plan. Policy S3 and the IDP provide the basis for developer contributions. Infrastructure is delivered through legal agreements/ conditions which are enforceable.
S3	Do not include policy	Four respondents considered that no policy on infrastructure delivery was required.	Preferred Option Selected for reasons set out in Background Paper
S3	Use evidence to support infrastructure delivery	It is important that the Council uses its evidence base (including the updated Playing Pitch Strategy) for sport and provides contributions to new sports facilities within the city.	The IDP sets out the infrastructure required to support the delivery of the local plan.
S3	Co-ordinated delivery of active travel routes	Prioritise a public health with a programme to join up and upgrade walking and cycling route into completed networks. Such a programme will pay for itself in health and productivity.	The IDP sets out the infrastructure required to support the delivery of the local plan.

Draft Policy	Topic	Summary	Response
S3	Shared service duct requirements for new development	With new developments, will services be required to be in shared service ducts and thus provide more space for trees especially street trees?	There is no requirement for services to share service ducts. Preferred Option Selected for reasons set out in Background Paper
S3	General comment	No idea what the text above is talking about.	Preferred Option Selected for reasons set out in Background Paper
S3	General comment	Additional infrastructure is needed for new people and developments.	Preferred Option Selected for reasons set out in Background Paper
S3	General comment	This should already be in place	Policy S3 recognises the importance of delivering infrastructure in a timely manner.
S3	Support	Support the policy subject to delivery on an appropriately phased timescale which will be development specific.	Support noted.
S3	Support	Support Preferred option which will ensure that development is more closely linked to infrastructure planning and should therefore encourage sustainable decision-making.	Support noted.
S3	Support	Having a policy seems a good thing to have.	Support noted.
S3 and S4	Support policies	Policy S3 and S4 are critical policies to ensure that policies contained within the Plan are deliverable and underpinned by sound evidence. Support inclusion of draft policy S4.	Support noted.

Statutory Consultee Responses – Draft Policy S3

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy	Summary	Response	Outcome
Draft Policy S3	Justification for the CBL 1,500m buffer for contributions is needed and confirmation of viability. S3 not fully deliverable as it extends beyond the city boundary. Not within 10mins walk.	Contributions have been viability tested. Policy S3 only applies to sites within city administrative boundary.	No further action.

National Highways

Draft Policy	Topic	Summary of comments	Response
S3	The Local Plan should provide a policy framework to ensure development cannot progress without the appropriate infrastructure being in place. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel, particularly on the SRN. Infrastructure improvements on the SRN should only be considered as a last resort.	Draft Policy S3 – Infrastructure Delivering in New Development advocates this approach. Infrastructure schemes covered in the IDP are included following discussions with key stakeholders.	At the meeting, the City Council and National Highways agreed that the issues raised within National Highways response to the Reg. 18 Plan consultation had been satisfactorily resolved.

Oxfordshire County Council

Draft Policy	Topic	Summary of comments	Response
S3	**Strategic Planning** Support the inclusion of strategic infrastructure projects (e.g., Oxford Station and Cowley Branch Line). Draft Policy S3 provides a defined buffer zone within which financial contributions will be sought. The County Council would prefer the policy to set out a more flexible approach. On this basis, the County is keen to continue working with the City on identifying suitable wording for this section of the policy between the Reg 18 and Reg 19 stages of the plan preparation. **Place Planning and TDM (Central)** Specific refence should be made to the city's Park & Ride (P&R) network alongside rail and bus. Emerging work to update the Oxford Park & Ride strategy suggests a need to provide more capacity serving the city within the plan period. This is linked to employment growth in the city, including redevelopment and intensification of existing and future employment sites as well as policy for more low car development. The County Council's core schemes (trial traffic filters, ZEZ expansion and workplace parking levy) will also increase demand for P&R.	Noted. Increasing the flexibility of the approach also reduces the certainty of receiving contributions as each development needs to be determined on a case-by-case basis. We will continue working with county colleagues as the plan production process moves forward. We cannot include infrastructure requirements based on unpublished or emerging work. If the P&R strategy is published in a timely manner, then we can consider updating the IDP	No action required. Worked with the Counnty Council to agree an amendment to Policy S3 to address this issue. Oxford City Action: Keep a "watching brief" for publication of emerging studies/ strategies

Draft Policy	Topic	Summary of comments	Response
	Emerging work also identifies the need for more consistent and higher quality facilities at existing P&R sites and improved interchange with other modes. Further bus service enhancements are also required to ensure all areas of the city are adequately served by P&R, again, particularly the south-east of the city.	with any identified P&R schemes that affect the city.	Oxford City Action: Keep a "watching brief" for publication of emerging studies/ strategies
	Innovation Hub New infrastructure should be futureproofed and consider how needs will change over time as both society and technology changes, including the need to mitigate and adapt to climate change.	See above.	
	It is important that the Local Plan sets out the need for new infrastructure and infrastructure improvements to consider these changes (e.g. changing grid demands with electrification of vehicles and heat, vehicle automation, greater digital connectivity, 5G/6G etc).	When the strategy is published and schemes/ infrastructure projects are identified we can consider their inclusion in the IDP.	
	Environment and Circular Economy The Household Waste Recycling Centre (HWRC) at Redbridge is a critical facility for householders to deliver their waste for reuse, recycling and composting for Oxford residents and beyond. It is anticipated that a HWRC in this location will continue for the foreseeable future.	Draft Policy S3 already includes a reference to "futureproofing" infrastructure. The requirements of the policy are to ensure that new development mitigates any impact by supporting	

Draft Policy	Topic	Summary of comments	Response
		infrastructure delivery. It would be for 3rd party infrastructure providers to deliver (and futureproof) any required infrastructure. Thank you for the update. No changes proposed.	

BOB ICB

Draft Policy	Summary	Response	Outcome
Policy S3	The ICB supports Policy S3 and welcomes the proposed engagement with developers to discuss the requirement of the infrastructure. The NHS body which is responsible for the commissioning neighbourhood health services or primary care services should be engaged in any pre-application engagements such as preapplication and planning performance	Noted. Noted.	No further action

Draft Policy	Summary	Response	Outcome
	agreement (PPA), including the delivery of neighbourhood health centres and other primary care health facilities in the city. The pre-application engagement will allow the ICB or as such appropriate body which is responsible for the commissioning neighbourhood health services or primary care services and the relevant PCNs to have further discussions with the Council and potential developers about the appropriate primary care mitigations as part of the wider housing developments. The ICB proposed the following wordings to the Draft Policy S3: "Development proposals to deliver a neighbourhood health centre and new primary care health facilities or improvement works to existing primary care health facilities will be	Noted.	

Draft Policy	Summary	Response	Outcome
	supported subject to the proposal complies with other policies set out in the Document. Developers must engage with the relevant neighbourhood provider, the Integrated Care Board or as such appropriate body which is responsible for the commissioning neighbourhood health services or primary care services to agree with the delivery and funding arrangement of the neighbourhood health centre or the primary care health facility."	Policy S3 is an overarching infrastructure policy which sets out that planning contributions will be sought from development to deliver required infrastructure to mitigate identified impacts from development. Draft Policy S3 sets out that "the standards of infrastructure delivery will be expected to comply with other policies set out in this Plan." Draft Policy S3 already includes an expectation for developers to engage with infrastructure service providers to discuss their requirements.	

Draft Policy	Summary	Response	Outcome
		Including bespoke healthcare requirements are not therefore required because the policy already sets out over-arching expectations relating to engagement and ensuring that infrastructure complies with the other policies in the Plan.	

All Public Responses – Draft Policy S4

Draft Policy	Topic	Summary	Outcome
S4 Viability	Undertaking assessments to support applications	Any assessment of viability regarding affordable housing must be undertaken by a suitably qualified independent viability consultant and that consultant must be agreed by the applicant in advance of any appointment.	Amendment made to policy to clarify this.
S4	Viability Evidence / study	Further work is required to ensure the Plan's assumption (that all planning applications that comply with policies should generally be assumed to be viable) is indeed the case. Testing in respect of older persons housing requires some clarification in terms of the assumptions made and we would encourage the council to engage with providers of such typologies at an early stage.	The Viability assessment of the plan has tested a wide range of development typologies to represent the types of sites that are likely to be developed in Oxford during the plan period. The contributions and

Draft Policy	Topic	Summary	Outcome
			requirements set out in policies are set at a level that the majority of qualifying applications would be able to deliver viably. This includes C2 forms of residential development, which can include communal older persons accommodation, and C3 which would include self-contained older persons accommodation.
S4	Viability Evidence / study	The Council's website does not include any evidence studies relating to Viability. This is a notable omission given that the wording of draft Policy S4 states that "the policies in the Plan have been viability tested". Without the Viability Assessment, it is unclear whether draft policies have been subjected to a whole plan viability assessment, which will then define how easily or not the aspirations can be delivered. Such an assessment would also define the percentage of affordable housing and answer the question of whether a lower level of affordable housing should be considered in order to allow for the environmental improvements sought. It is difficult to comment on individual policies and wider implications (including in relation to future site allocations) without understanding how they impact on the need for housing and employment land and indeed viability overall. Viability evidence to support the plan not published as part of the Reg. 18 consultation. Without viability evidence, the cumulative cost impact of policy requirements (including increased CIL Rates,	The Viability assessment is an iterative process, to test emerging draft policies, inform refinements to policies, and test final policies. At the Regulation 18 consultation the assessment was not published because it was incomplete. Policies requirements are assessed individually and cumulatively as a whole plan, in order to test the full range of policy requirements which an application might be required to deliver.

Draft Policy	Topic	Summary	Outcome
		S106 etc.), cannot be properly assessed. Viability evidence also needs to consider emerging WPL etc.	
S4	Viability Evidence / study	Given the number of emerging policies affecting R&D-led development, the viability evidence must use realistic inputs and test appropriate site typologies, including lab-enabled buildings with high servicing and sustainability requirements.\n\nConcerned that a generic, one-size-fits-all viability approach has been taken, which fails to reflect the distinctive operational, ownership and financial realities of specialist sectors such as life sciences.\n\nMacro-economic events and interest rate rises can have a significant and long-lasting impact on the property market. It is important that the viability of the development plan is therefore resilient, and that the viability work supports this.	The Viability assessment of the plan has tested a wide range of development typologies to represent the types of sites that are likely to be developed in Oxford during the plan period. The contributions and requirements set out in policies are set at a level that the majority of qualifying applications would be able to deliver viably.
S4	Impact of policy requirements on viability (particularly employment uses)	The Local Plan should not put in place policies that fetter development opportunities from being brought forward or that mean those tasked with major development investment decisions must operate at the margins of viability.\n\nConcerned about the cumulative impact of the cost of the proposed policies in the plan (particularly in relation to employment uses), which are in addition to the recent amendment to the CIL Charging Schedule. Those increased costs will ultimately be reflected in rents charged to occupiers.\n\nRising occupier rents on top of tax rises including National Insurance and Business Rates, will reduce the funding available	The policies in the plan have been assessed in the viability modelling to help inform the level of contributions are set at an appropriate rate so as not to fetter development. This is in accordance with the NPPF which requires local plans to be deliverable, meaning that obligations and policy burdens should not make development unviable. The testing has taken into account the recently

Draft Policy	Topic	Summary	Outcome
		for their research and development activities and risks driving many away from Oxford to more competitive locations both within the UK and abroad. That would have a profound and potentially irreversible impact on Oxford's position as a leading centre for innovation. We request that the cost of proposed policy changes, are assessed and considered as part of any transparent decision-making process as part of the Plan progresses. Serious concerns about the viability and deliverability of development within the Local Plan. Paragraph 86(c) of the NPPF is clear that planning policies should facilitate modern economic development, including science and innovation. Introducing further financial burdens (on top of already high land values and infrastructure costs) risks deterring occupiers and investors. Concerned that additional planning costs will mean that key employment sites become undeliverable.	updated CIL rates for employment as well. In the event that it is not viable for a proposal to deliver the full policy contributions, then the Plan also builds in flexibility via the cascade policy in S4, so that proposals can be adjusted until they become viable.
S4	Viability cascade for Residential development	We note that this Policy recognises that imposing the 'low car requirement' in the parking policy (Policy C8) will be very unpopular with residents, will therefore reduce the selling price of properties, and will contribute to difficulty in achieving viability of developments needing other requirements such as having 40% affordable homes.	The viability assessment has tested the impact of Policy C8 and found that the majority of typologies can deliver this requirement along with other policy requirements. Furthermore a lot of proposals would be in locations where C8 policy did not apply.
S4	Viability cascade for Residential development	The overall goal must be to increase the number of houses, it is extraordinary that to maintain viability, car provision, and consequent loss of space for housing, is increased first and then affordable housing provision. It is clearly better to have 10 homes	Viability testing builds in an assumption for developer profit in accordance with the NPPF guidance for a developer profit margin of 15% to 20% of the

Draft Policy	Topic	Summary	Outcome
		with two affordable, than 6 houses, 3 affordable, with space wasted for parking and car infrastructure. This is ineffective as there is no definition of viability, which would be considerably more than breakeven for a developer to proceed with the development.	Gross Development Value (GDV). Agreed that the number of homes is important but so is the affordability of homes, in the context of the affordability crisis in Oxford specifically.
S4	Viability - development costs	The science and innovation sector, like the wider UK development industry, is navigating significant challenges: rising construction costs, global competition, constrained funding conditions, and increasing regulatory obligations.	The viability assessment to inform the plan, takes into account recent, current and forecast future market trends.

Statutory Consultee Responses – Draft Policy S4

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome
S4	**Strategic Planning** Do not support the viability cascade as it is not in line with the county's policies on low carbon or the LTCP objective to reduce car trips. The County Council would like to see developers encouraged to make the best use of land, creating sustainable buildings at	See below for rationale for inclusion of the viability cascade. Other policies in the plan already cover these specific issues. Policy C8 sets out motor vehicle parking design standards. For residential development, this includes setting criteria for low car schemes (0.2 spaces per 20 dwellings) and maximum parking standards that reflect the County Council's residential parking standards for Oxford city. For non-residential parking	This response was sent to the County Council for review. Following a review and further discussions between City and County officers, no further

Draft Policy	Summary	Response	Outcome
	good densities and not using land wastefully on car parking. Draft Policy S4 should be amended to remove a hierarchy that allows the removal/ minimisation of net zero buildings and that allows an increase of car parking contrary to the County Council standards to not be met before there is any consideration of reducing the affordable housing requirement. Instead, all the possible allowances to provide for viability should be considered in the round	developments, the starting point is no additional parking (except for blue badge/ servicing) and a reduction in spaces will be sought at highly accessible sites. Any additional car parking at non-residential developments should be kept to a minimum, with the need being demonstrated through submitted TA. Policy HD8: Making Efficient Use of Land sets out the expected densities for development (i.e., 100dph for the city/ district centres/ 80dph for gateway sites/ 60dph in most other locations. Policies R1-R3 provide the plan's requirements for delivering sustainable buildings. Policy R1 provides that offsetting may be accepted, as a last resort, to offset remaining energy demand that cannot be sourced on-renewably on- or off-site. The policy sets out that the City Council will accept payment into the Council's offsetting fund for this remaining energy demand (secured through an appropriate legal agreement/ S106). Policy C8 and Appendix 7.6 set include vehicle parking standards (both "low car", and the aligned city/ county residential parking standards for Oxford). The viability cascade does not suggest that parking standards would be allowed that was contrary to city/	specific action was identified.

Draft Policy	Summary	Response	Outcome
		county (Oxford) standards but rather that these are effectively the "fall-back" position.	
	Place Planning & TDM (Central) This section of the Preferred Options document comes across as overly permissive. What the 'particular circumstances' are and what the relaxed standards would look like would be important. Such instances should be exceptions rather than the rule and any relaxation of standards should be kept to a minimum. In cases where there is no affordable housing requirement, we doubt that there is a need for any relaxation of standards. If allocating car parking spaces to units is considered necessary to make a development viable, a transport assessment may be required to demonstrate this is acceptable however we are concerned that any such policy contained in the Local Plan will	National Policy (paragraph 35, NPPF) sets out the plan should set out the contributions expected from development and that such policies should not undermine the deliverability of the plan. Policy S4 provides a viability cascade which sets out the City Council's approach "if the applicant can demonstrate the development to be unviable". While the viability assessment for the plan provides the technical evidence to demonstrate that the policies in the plan (as a whole) should not undermine the deliverability of development, there are 'particular circumstances' (as set out in Paragraph 007 reference ID 10-007-20190509 of the PPG.	

Draft Policy	Summary	Response	Outcome
	encourage developers to claim that car-free or low car parking requirements affects their viability and that would put the County Council's policies at risk. **Innovation Hub** Before any standards were to be relaxed, consideration of whether the developer has taken innovative solutions into account would be beneficial, i.e., relaxation of standards should be considered only after every alternative has been ruled out, especially in relation to sustainable development. **Climate Action** The County Council notes the preferred option could result in a key aspiration of the Local Plan, to reach net zero by 2040, to be lost if developments enter negotiations based on viability. This is concerning as the cost and emissions savings of implementing net zero standards at the build stage is significantly	Policy S4 sets out that it is the carbon offsetting payments that should be reduced incrementally until viability is achieved (rather than reducing the environmental quality of the development). The ordering in the cascade represents the city's priorities.	

Draft Policy	Summary	Response	Outcome
	lower than achieving later through retrofit, and this additional cost will likely fall onto the occupant.		

All Public Responses to the Plan Process Overall

Topic	Summary of comments	Response
Consultation process- early engagement survey	The early engagement survey had 228 responses from a city of 165,000 residents but inclusive early engagement is critical and should use methods to capture input from many more, and particularly communities who are most difficult to reach. The results from this survey are not mentioned in the PO consultation.	Although the 2042 plan is a new plan, it can build on a lot of the work of the 2040 plan, which itself was informed by extensive consultation. Focus of the early engagement was in setting the scene that there are a few areas where the context has changed, but a lot of existing work to build on. The success of a consultation can't be measured only by the number of responses. The first statutory consultation at Regulation 18 had a much wider reach and bigger response rate. Nevertheless, statutory requirements are exceeded by an early engagement taking place.

Topic	Summary of comments	Response
Consultation questions – Q2: short survey	Wording of Q2 (short questionnaire) is misleading. Taking Care of Our Environment of the Planning Oxford's future: first draft Local Plan 2042 states: *We think it is important that Oxford is a green biodiverse city… We are protecting our important green spaces and features*. Instead, draft policy only protects sites which already have legal protection i.e. SSSIs and SACs. There is no protection for local wildlife sites. Yet many people will have voted in favour of this draft policy, under the misapprehension that it does indeed 'protect ALL our green spaces and features', not just the ones which the Council is legally obliged to protect. The misleading nature of this question invalidates not only the responses given but also invalidates the whole survey.	The plan includes a hierarchy of protection for ecological sites as well as protecting "Core Green and Blue spaces" - Policy G1. Policy G6 protects locally designated sites and sets out strict criteria which must be met, including "satisfactory mitigation and compensation".
Consultation process	Concerns over the complexity of the surveys, arguing this will exclude many from responding and responses will therefore not be representative of Oxford. Suggest introducing 1) Short video explanations for people who struggle with reading	This feedback has been noted and will be looked into for the Regulation 19 consultation and further consultation events.

Topic	Summary of comments	Response
	2.) Sending consultation out in sections (instead of whole plan) with deadline to return 3) have more localised consultation 4) have direct links to different sections on the online survey 5) have the option to save and return to the online survey. Questions are ambiguous and leading. Why is it not possible to vote on the alternative options if you are consulting on them anyway? All consultation material should meet professional standards for qualitative surveys. Furthermore, the list of site allocations should have been provided alongside the short surveys (not just the online surveys).	
Preferred options weighting	No information is given on what grounds preferred options are proposed/favoured and how that takes account of the evidence (e.g. the GI study report concludes Oxford's green spaces should be preserved and enhanced and new created, but only a tiny 'core' of these spaces are protected).	The background papers do set out a number of options in nearly all cases, and explain why the draft policy options were preferred. The background papers also link back

Topic	Summary of comments	Response
		to evidence and other relevant information to inform decisions.
Consultation process	Many planning authorities have a separate consultation on proposed site allocations after the Regulation 18 consultation, and we think that this would have been much fairer, especially as the next stage of consultation is supposed to concentrate on the plan's soundness only. This consultation also seems premature in relation to some of the proposed new site allocations as they are described as being still under investigation.

In addition, we have had difficulty responding as there are errors and inconsistencies in the mapping and text, and the background information is incomplete. In our local area the interactive policy map shows more site allocations than are shown on the site allocation map in the online survey questionnaires. This seems likely to confuse or even invalidate some consultation responses. For at least one site (Warneford Hospital) the site assessment information is also missing.

Approach to consultation engenders dis-engagement from democratic process. Site at | The proposed sites were included in the Regulation 18 consultation with proposed uses, just without detailed policies, But often there are no detailed policies on any topic at Regulation 18 anyway.

The Regulation 18 consultation ran into the school summer holidays, but was largely outside of them. |

Topic	Summary of comments	Response
	Meadow Lane remains allocated despite 50 emails objecting to it. Timing of consultation inopportune – start of school holidays when many people in community organisations are on leave or have childcare responsibilities. Hinders community stakeholders being able to give a meaningful & genuine response. We would welcome further & deeper engagement with stakeholders/networks which represent communities in Oxford.	
Headington Neighbourhood Plan is a "material consideration"	The Headington Neighbourhood Plan, (valid until 2026) which went through multiple thorough consultations, generated lots of responses and was approved by the Council must be a Material Consideration. Yet its Green Spaces and Biodiversity policies have been completely ignored. They would be an excellent basis for the policies of the Draft Local Plan 2042. Relevant polices in the HNP are as follows; GSP1: CONSERVING AND ENHANCING PUBLIC ACCESS GREEN SPACE	The Local Plan does not seek to replicate existing policy already contained within the development plan for Oxford. The Local Plan provides an opportunity to set the local planning policy framework for the entire city. Where policies in the Headington Neighbourhood Plan remain up to date, these should be taken account of in the decision-making process.

Topic	Summary of comments	Response
	GSP2: PROVISION OF GREEN SPACE WITHIN DEVELOPMENTS GSP3: CONSERVING AND ENHANCING BIODIVERSITY	
Whole plan	**My objections to the Local Plan are**: 1. lack of transparency over the plan amounting to 'residents should not be allowed to comment or even know what is planned' 2. Where are the background papers for previous rounds of consultation feedback? 3. Why are Green Spaces not protected adequately – but seen as 'development sites' 4. The options on the consultation do not provide any evidence for the decision made 5. If there are background papers to support 'preferred options' – where are the background papers or the justification for these options, and where is the feedback from the alleged Early Engagement?	1. This engagement exercise was intended as a way of enabling residents to see what is planned and to comment. 2. The consultation report for the early public engagement survey was published ahead of the Regulation 18 consultation 3. The vast majority of green spaces are strongly protected 4. Attempts were made to explain why preferred options were put forward.

Topic	Summary of comments	Response
	6. the survey report identified cross cutting themes: the protection of green spaces, sustainable infrastructure(especially sewage and flooding risks), the importance of aligning development with community health and wellbeing – however there is NO INFORMATION on how feedback on critical issues has informed the Preferred Option	5. The options were shown in the published background papers.
		6. The explanations for the preferred options do refer to background information where relevant.
	7. Where are the background papers to prefer one green space Development site over another?	7. The Green Infrastructure Background Paper explains the approach
	8. Where is the list of sites allocated for development - vital for residents to know what development is planned for their area and to ensure a strategic overview and not a blinkered generic response- is not provided in the short surveys (printed flyer and short online survey). Only the long online survey, that is least accessible to the majority of residents, gives the list of development sites and asks for feedback on whether these should be allocated	8. The sites were listed within the main document, but were not listed in the short questionnaire because that would have made the questionnaire not short or as accessible or possible to deliver door to door- but the questionnaire explained where ot find the information.
	9. Wording is misleading, failing to define commonly used terms such as	

Topic	Summary of comments	Response
	'important green spaces' and 'affordable' housing. In reality, the term 'important' green spaces is limited to 'core' green infrastructure with legal protection rather than spaces important to local communities, joined up biodiversity or climate adaptation; the term 'affordable' is unclear and undermined as unaffordable in the background documents with the introduction of a new term 'truly affordable' - a phrase that is not defined. **The Draft Local Plan will worsen Oxford's current problems because:** • LP Preferred options 2042 consultation does not achieve a balance between the economic growth agenda and the societal and environmental needs of the city. • Policies promoting economic growth are prioritised and stated as requirements. • Policies around green infrastructure, heritage, place, culture and equality are worded as vague aspirations, merely 'seeking to' rather than requiring	9. Care will be taken to ensure important phrases are defined in the Glossary. The plan aims to balance competing needs and considerations. The policies follow standard wording. The majority of the green spaces are strongly protected. There has to be some flexibility to allow reprovision, but many green spaces are strongly protected in situ.

Topic	Summary of comments	Response
	• The majority of the City's green spaces have no genuine protection **This consultation and plan should be rejected on the grounds that** • it hides the criteria/evidence on which the plans are being made • **economic growth appears to be the driver of this Local Plan and not plans which enhance Oxford for residents and which protect the local environment** • consultation with the public has not been in depth despite the claim on the City's website *'We can't get the Local Plan right without input from the community.'*	
Whole Plan	The entire plan is centred around the "ecocidal" model of growth economics. Wealth inequality is increasing. The earth cannot continue to sustain 8billion humans (the global economy and population size need to shrink by about 75%). Without healthy eco-systems and a	Comment noted. The Plan does attempt to balance need.

Topic	Summary of comments	Response
	reliable climate we are going to be increasingly challenged to survive.	
Whole Plan	The plan seeks to introduce a raft of new requirements for development including building performance and ecology. While these are important matters for the local plan they need to be applied within the economic realities of development.	Comment noted- these measures are viability tested.
Policies Map	It is noted that the site is within one of the 'Areas of Greater Potential' identified within Figure 7 of the High Buildings TAN 2018 (area 5A – Cowley Residential Suburb). As described in the TAN, these areas are where proposals for new high buildings are more likely to be appropriate. The site is also within the 'Dynamic Area' 7 – Temple Cowley Centre. We request that these areas and heights are included on the Draft Policies Map, which is currently limited to certain layers. We would also request that the support for growth, regeneration and high buildings is clearly advocated and supported within the site allocation policy for Templars Square.	These areas are not considered appropriate for the policies map, and they provide background information but do not have a specifically applied policy approach.

Topic	Summary of comments	Response
Evidence base	We note that a number of Local Plan evidence base documents are not available at this Regulation 18 consultation stage. This includes an updated Housing and Economic Land Availability Assessment (HELAA). It is essential that these documents are published as soon as possible so that their contents can be used to inform the preparation of the draft Plan and for comments to be made upon them.	The full evidence base will be published at Regulation 19.
Plan Period	The proposed plan period is from 2022 to 2042, which reflects the 20-year plan period in the adopted Plan (2016-2036). There is an issue with the starting date for the period being 2022 given that it is 3 years before the submission of the plan and 4-5 years before its likely adoption date. In addition, whilst the 2042 end date would achieve the minimum 15 year plan period, this is based on the plan achieving the programme in the LDS with the emerging plan being adopted in 2027. Given that this allows no room for slippage, the Group proposes a later date for the end of the plan.	Since the Regulation 18 consultation, the Plan period has been adjusted to a 2025 start date, with a plan period now of 2025-2045. The LDS has been updated to reflect this.
Viability Evidence	The Group is concerned that the current consultation lacks detailed viability evidence to	The Viability assessment is an iterative process, to test emerging

Topic	Summary of comments	Response
	show the proposed policies are deliverable, particularly when combined with existing infrastructure costs like CIL. They stress that, according to planning guidance, viability evidence should be proportionate and part of an ongoing process. They request that such evidence be published for consultation to allow proper scrutiny of the potential impact on both commercial and residential development.	draft policies, inform refinements to policies, and test final policies. At the Regulation 18 consultation the assessment was not published because it was incomplete. Policies requirements are assessed individually and cumulatively as a whole plan, in order to test the full range of policy requirements which an application might be required to deliver.
Duty to cooperate	It is a serious and fundamental concern that whilst the Council have stated that the Plan will be based on a capacity led approach, that no Duty to Co-operate paper has been prepared to address the question of unmet needs. The Plan states only that "discussions will continue about the remaining unmet need to 2042." (paragraph 2.3 of the Reg 18 Local Plan"). Given the Council's approach in the local plan is capacity based, the issue of unmet needs (whatever the figure is – see below), needs to be addressed, given the acute need for housing in the City, and the	Duty to Cooperate work with neighbouring district councils is ongoing to address Oxford's unmet housing need.

Topic	Summary of comments	Response
	importance of the provision of housing to economic growth not only in Oxford, but for the County of Oxfordshire and its contribution to the national economy in terms of significantly boosting the supply of housing.	
Duty to cooperate	To address the "acute housing pressures" in Oxford and the "urgent need for more housing", the Council is encouraged to maximise the provision of housing within the City and then liaise with its neighbouring authorities and other organisations to account for any unmet housing need. This should be done on a regular basis to address the recommendations made by the LP40 Examination Inspectors.	Duty to Cooperate work with neighbouring district councils is ongoing to address Oxford's unmet housing need.
Plan Period	The Council have set the plan period at 2022 – 2042. Using the Standard Method (SM) Oxford housing needs are 1,087 dwellings per annum, (this reflects the latest housing stock data). Over the proposed plan period, 2022 – 2042 this equates 21,740 dwellings, which on the basis of the Council's supply will result in a considerable level of unmet housing need that must be accommodated elsewhere.	The plan period has been adjusted to 2025 – 2045. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.

Topic	Summary of comments	Response
	The Council have chosen the start date of 2022 which is over four years prior to submission of the Plan in April 2026. The base date should be 2025 since the SM takes account of past supply through the affordability uplift to determine housing needs. As set out in the NPPF and PPG local plans are meant to look forward a minimum of 15 years (para 22), past delivery is taken into account through the use of the standard method. The PPG Housing and Economic Needs Assessment Paragraph: 004 Reference ID: 2a-004-20241212 explains how the Standard Method is calculated using the existing dwellings stock for the area and "the most recent data published at the time should be used." As set out in the PPG the Standard Method also requires the affordability adjustment to be based on the most recent data, in this case it is the median affordability ratio 2024 that was published in March 2025.

This suggests that the starting point should be in the year to which the affordability ratio relates. Consequently, it follows that the plan period should commence in 2025/26. | |

Topic	Summary of comments	Response
	There have been recent examples (West Berkshire Local Plan, Isle of Wight, and North Norfolk Local Plan) where the Inspectors examining local plans have required the plan period to be extended to reflect paragraph 22 of the NPPF and for the starting point of the plan to be brought forward a year to reflect national policy in respect of the assessment of housing needs. The plan period should therefore be 2025 – 2042, resulting in a housing need of 1,087 x 17 = 18,479 homes.	
Plan Period	The Plan period runs from 2022 to 2042. If the Plan is adopted by March 2027, the strategic policies in the Plan will have a maximum lifespan of 15 years. This is supported by ChCh. If there is any slippage or delay in the timetable then the LP42's lifespan will be less than 15 years and will need extending. Should that situation occur then the LP42's housing need will also need to be increased accordingly.	The plan period has been adjusted to 2025 – 2045 and the housing need recalculated to reflect this. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.
Structure of Local Plan Survey	Found the local plan survey difficult to understand due to complexity and time constraints; concerned that many residents will be excluded from the	As well as the long questionnaire, that necessarily covered all

Topic	Summary of comments	Response
	consultation. Urges clearer, more accessible communication to enable meaningful public input.	proposals, there was also a short questionnaire.
General Comments: Ineffective Language/ Objectives not set	A Plan should not be only aspirational but lay out concrete measures by which the stated objectives are to be realised, it is therefore *ineffective* where policies are *fluffy*. Phrases such as *"should have regard for..."*, *"take opportunities taken...", "be informed by...", "into consideration..."*, *"should"*, etc. are not *effective* as clear goals are not set, and at most belong in the supporting text. The Council seems to impose solutions to issues, enforcing specific solutions on development, therefore this is not *positively prepared*. Much of the content of policies should be in the supporting text. Frequently, "policies" consist of idle speculation, and vaguely articulated and formed ideas - these are marked as *fluffy* or *waffle*. Verbose site description is	Draft Policies will alll be reviewed to ensure effective and appropriate policy wording.

Topic	Summary of comments	Response
	waffle if not backed up with concrete policies detailing what is and not acceptable given the characteristics. "Reduce" is either meaningless as the baseline is not given, or not related to the application so ultra vires, as the condition must relate to the application. Many policies seem to assume that, if a report is written, the planning result will obtain, without providing any metrics as to what the goals or thresholds are to allow consent.	
General Comment: Repetition between site/ area policies and general policies	Many site-specific policies repeat endlessly concerns that should be, or are, general policies such as car parking, flooding etc, this is ineffective as it can lead to confusion or lack of consistency and is frequently simply wrong eg: *Policies G1 and G3 require protection of existing green infrastructure features and enhancement of*	The Reg. 18 consultation document (June 2025) did not contain any site-specific or area-based policies. The inclusion of specific references within site allocation policies can be useful, particularly when signposting how development at a

Topic	Summary of comments	Response
	greening on site through the urban greening factor. Policy G5 requires onsite biodiversity enhancement, and Policy G2 requires new Green Infrastructure features and enhancement of existing features. It is expected that those requirements will be met in the following ways. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI. (JR, Churchill, NOC) Is not only needlessly repeated, but factually wrong – G6 and G7 are the relevant policies.	particular site or area can meet/ achieve wider policy aims.
Sites not up to date	A number of sites listed (e.g.: Marston Paddock) have already been developed but remain in the plan, these are ineffective as already developed.	We will review the list of sites to ensure that they are up-to-date for the next stage of consultation.
Plans Confused With Execution	The requirement to produce a plan (eg Traffic Assessment, SA etc) is confused with the actual goal, which is to achieve specific outcomes. A plan is not a goal, it is a means to a goal therefore these policies are ineffective.	Plans are underpinned by evidence, which inform their production. Certain policies include requirements for additional evidence to be submitted alongside planning applications. This is to assist the

Topic	Summary of comments	Response
		decision-maker in coming to an informed decision.
Policy Map	It is not clear which Policy Map is the authoritative version, all are peppered with errors and omissions and not consistent with each other, rendering the OLP2042 ineffective and unsound. Green Spaces demarcation, possibly due to the illogical and wrong Green Space Survey 2020, is fundamentally incorrect. See Green Spaces (G1-G9)	The current extant policy map is for the adopted Local Plan 2036. A draft Policies Map was produced and consulted on as part of the Reg. 18 consultation (June-Aug 2025).
National DM Policies	The Levelling Up and Regeneration Act 2023 sets out provisions to introduce National DM Policies (NDMPs). NDMPs will implement a suite of national policy provisions for decision making with a view to streamlining Local Plans, enabling plan-makers to focus on matters that are genuinely local whilst also supporting consistent local decisions. Consultation on NDMPs is expected later in 2025 (prior to adoption/ possibly submission of Oxford's emerging Local Plan. Once adopted, Local Plans must not contradict or duplicate NDMPs – as per	Comment noted.

Topic	Summary of comments	Response
	Section 15C(7)(b) of the Planning and Compulsory Purchase Act 2004.	
	ARC recommends the Council closely monitors NDMP developments and considers their implications carefully when drafting and reviewing development management policies.	

All Public Responses to the Whole of Chapter 1

Draft policy	Topic	Summary of comments	Response
Vision & Objectives	Support for heritage and biodiversity principles	Mansfield College supports the vision for the City to provide a healthy and inclusive City with equal opportunities which respects its identity, heritage and maximises the opportunities to enable business, knowledge and innovation to grow. The College also support the principle behind to support biodiversity and to protect the green infrastructure and resources of the City. The College is supportive of the objectives of the Local Plan which align with the College's aim to attract the best students to the City from all social backgrounds and ensuring an appropriate quality of accommodation for all who study in the City.	Support noted.

Draft policy	Topic	Summary of comments	Response
Vision & Objectives	Maximising delivery of homes	All opportunities must be taken to deliver new homes on sites within the City's boundary that are suitable, available and deliverable and meet the requirements of national planning policy. Those opportunities can and must include the development of sites that are in the Green Belt	The Green Belt has been assessed for opportunities, although much of it is functional flood plain, of high importance for wildlife or well used parks, etc, and is not available or developable.
Vision & Objectives	Reducing inequalities	Would like stronger & explicit reference to the following principles for reducing inequalities: • agency & participation – many residents feel excluded from decision making & shaping policies, would also like more tangible opportunities for neighbourhood-level involvement in specific developments. Eg neighbourhood plans, especially in economically-marginalised areas; working with community anchor organisations; more transparency and community involvement in spend of CIL and S106 eg via community covenants; ensure that those who experience housing inequality are given opportunity to input to policies eg travelling communities; using tools like citizens assembles to strengthen participation in complex planning decisions.	The Plan has clear objectives to tackle inequalities and ensure strong communities. It can't, however, control who owns or manages developments.

Draft policy	Topic	Summary of comments	Response
		• Recognise role of Community ownership & stewardship in owning & managing spaces – housing, community buildings, shops, green spaces. Eg stronger mention of community-led and cooperative housing (see Collaborative Housing Hub report). • Strengthening Oxford's Social & Solidarity Economy (SSE) - recognise them as partners in delivering key elements including affordable housing, renewable energy and community facilities.	
Vision & objectives	Environment and landscape setting	The environment is identified as one of the six themes underpinning the Council's vision for Oxford in 2042. We agree that Oxford's environment, particularly its broader landscape setting, is a characteristic feature of the city. Oxford is situated at on the floor of a valley surrounded on all sides by undisrupted green hills, creating the effect of a 'green bowl' around the city. This 'green bowl' provides the backdrop to historically significant views out from the city and is the reason for the protection of Oxford's view cones within policy. Figure 1.2 sets out the underlying objectives associated with each of the six themes and there is no mention of Oxford's broader landscape setting. The protection of the characteristic landscape setting of the city essential to its semi-rural identity should feature more prominently within the objectives associated with Oxford's landscape.	The objectives do cover the need to respect heritage and the importance of green spaces.

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		We recommend that these objectives are changed to highlight and reflect the significance of Oxford's wider landscape setting.	
Vision & objectives		Worcester College can confirm that it supports the wider visions and objectives set out in the draft Local Plan, with particular support for the acknowledgement of the need to support Oxford's reputation as an international destination for high quality education and learning.	Support noted.
Vision & objectives	Support	We consider that the policies contained within the plan are generally positive. We strongly agree with the plan objectives and the three overarching threads to reduce inequality, address climate change and enable a liveable city. However the proof will be in the delivery. The Plan's objectives and strategy (Figure 1.2, pp 13-14) should say more about supporting the use of public transport and sustainable modes of travel over the use of cars. In addition, in line with NPPF para 124, strategic policies should "set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land". We would like to see this principle explicitly recognised within the strategy.	The support is welcomed. The objectives are clear that protection and enhancement of important green infrastructure is a key aim, as is taking: *opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city*.

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Vision & Objectives	Not ambitious enough	The Plan does not meet its evidenced need – whether that is standard method derived or economic growth driven. Lack of affordability undermines economic growth and prosperity and works against the Vision objectives in respect to healthy and inclusive communities and equal opportunities for access to all basic needs to include homes, health, employment, nature and community infrastructure. A Plan that does not deliver sufficient homes, whether that be within its own boundaries, or by securing a robust strategy through which needs can be met cross boundary, will not deliver on a Plan vision that strives to achieve social inclusion and support communities that benefit from equal opportunities including as referenced – opportunities for access to housing. Hallam is not suggesting that the Council should water down its ambition. Indeed, the Vision should be appropriate to the City's prominence, influence and economic success; ensuring those qualities are strengthened and sustained and optimum outcomes for the economy, people and environment are achieved. The Plan must therefore provide a	An overarching thread of the plan is to reduce inequalities, and many policies are intended to work towards addressing this.

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		strategy to deliver that, with an appropriately planned level of growth.	
Vision & Objectives		Lincoln College support the Plan's overall spatial strategy.	Support is noted.
Vision	Proposed amendment	ChCh generally supports the Vision for Oxford but it does not address two key aspects: 1. the important role that the two Universities play in Oxford; and 2. the acute housing need in the City. The Universities and Colleges play a fundamental role in the social, educational, tourism, and local economy of Oxford, and indeed wider Oxfordshire,. In addition the Universities and Colleges require a functioning ecosystem. Good schools are part of this and access to schools for children of visiting academics is important. The LP42 must encourage and support schools expand and enhance facilities as needed. These points should be recognised in the Vision. Whilst the draft LP42 makes reference to there being a "chronic undersupply of housing", the Vision does not acknowledge this or set out any meaningful approach to addressing it. This should be a fundamental element of the LP42.	The Vision sets out where we think the city should be in 2045. It is not the primary means of setting out how we are going to get there. These points are well covered by other elements of the strategy, including the objective and the strategic policies, as well as by the plan generally.

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		In terms of the lifespan of the Vision, ChCh notes that the NPPF encourages Local Plans to have a Vision which looks over a longer term period (at least 30 years). In particular, where larger scale development is proposed and to take account of likely timescales for delivery. Whilst this is not a requirement for the LP42 given the lack of large scale development proposals, having a longer term Vision for Oxford (which envisages how Oxford's housing and employment needs will be delivered over the longer term) is important given its inability to meet its identified housing need. To respond to ChCh's comments, the following amendments are suggested to the Vision: "In 2042 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses, **the University of Oxford and Oxford Brookes University to prosper. The vision is one which addresses the housing needs in Oxford by making efficient use of land in the City and working collaboratively with neighbouring authorities to address any shortfalls in housing delivery and supporting infrastructure**; and supports research and	

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		development in the life sciences and health sectors which are and will provide solutions to global challenges. The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air. The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies."	
Objectives and Strategy	Support	ChCh supports the objectives for the Plan, which are built off the six themes. In particular the recognition of the help that should be given to Oxford to continue in its role as a national and international destination and support the visitor economy.	Support noted.
Overarching Threads	Support but policies need to go further.	ChCh supports the Overarching Threads to reduce inequalities across the City, and to address climate change. However, the two elements that the Plan does not address in full (as 'overarching threads') are housing (see H1 response), and infrastructure/transport (partly because this is for the County Council). The policies need to include flexibility to provide an inclusive society.	Comments noted.