

Chapter 6 – A City that Respects its Heritage & Fosters Design of the Highest Quality

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Headlines for Chapter 6:

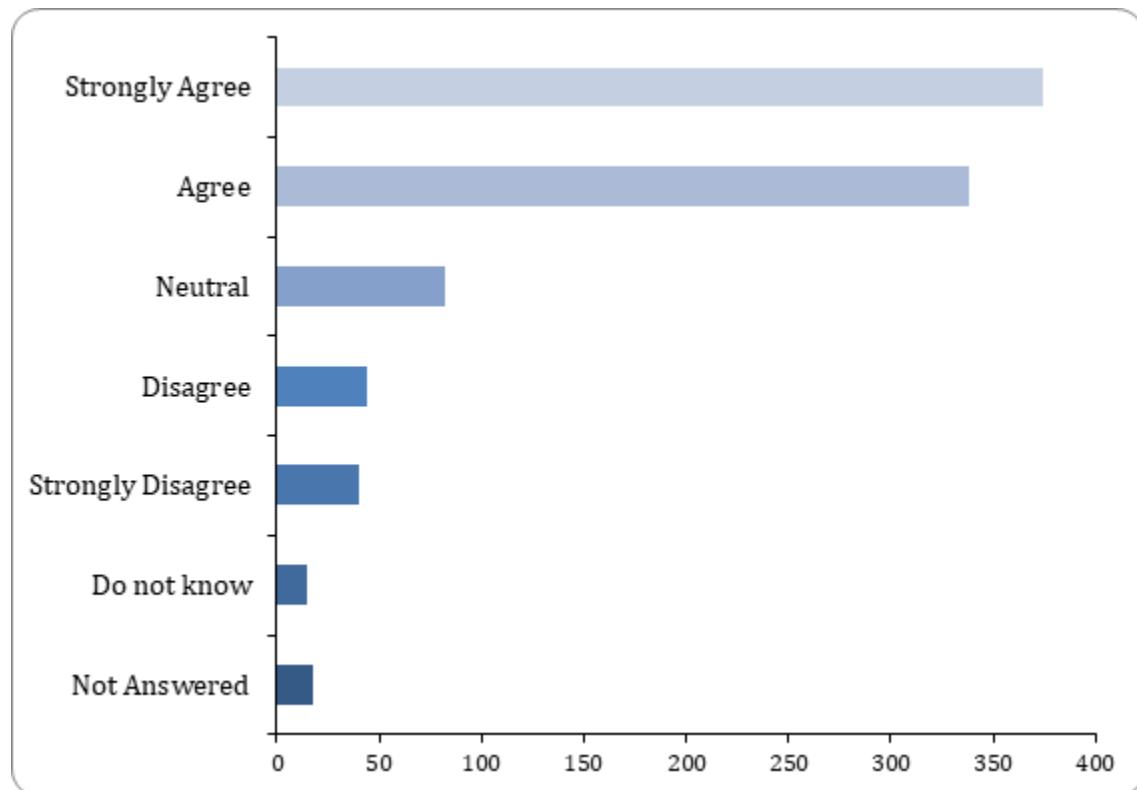
- Preserving Oxford’s unique heritage must be prioritised
- Other comments expressed a different sentiment, that heritage should not hold back green innovations (such as retrofitting), housing expansion and businesses
- General support for medium-to-high density development, to maintain green belt and third spaces however, infrastructure must also be to a high standard
- Some comments perceive the policies are ineffective, either because they are not specific enough or because they are seen to be included in the NPPF
- Affordable housing and new developments need to be of a high quality (good materials and design) to allow them to last
- New developments should merge with the character of the surrounding built environment, including heritage
- Green space is crucial for health, wellbeing and climate adaptation
- To become a cycling city, bicycle infrastructure needs to be improved
- Cyclo supports all policies in this chapter

Short questionnaire responses

Good design

Good design is about ensuring development functions positively for the people who live and work there and that it makes best use of land and respects heritage. We have also drafted a policy that requires high density development and efficient use of land first and foremost, alongside policies to ensure design respects heritage including views of the renowned skyline. To what extent do you agree with this approach?

There were 893 responses to this part of the question.

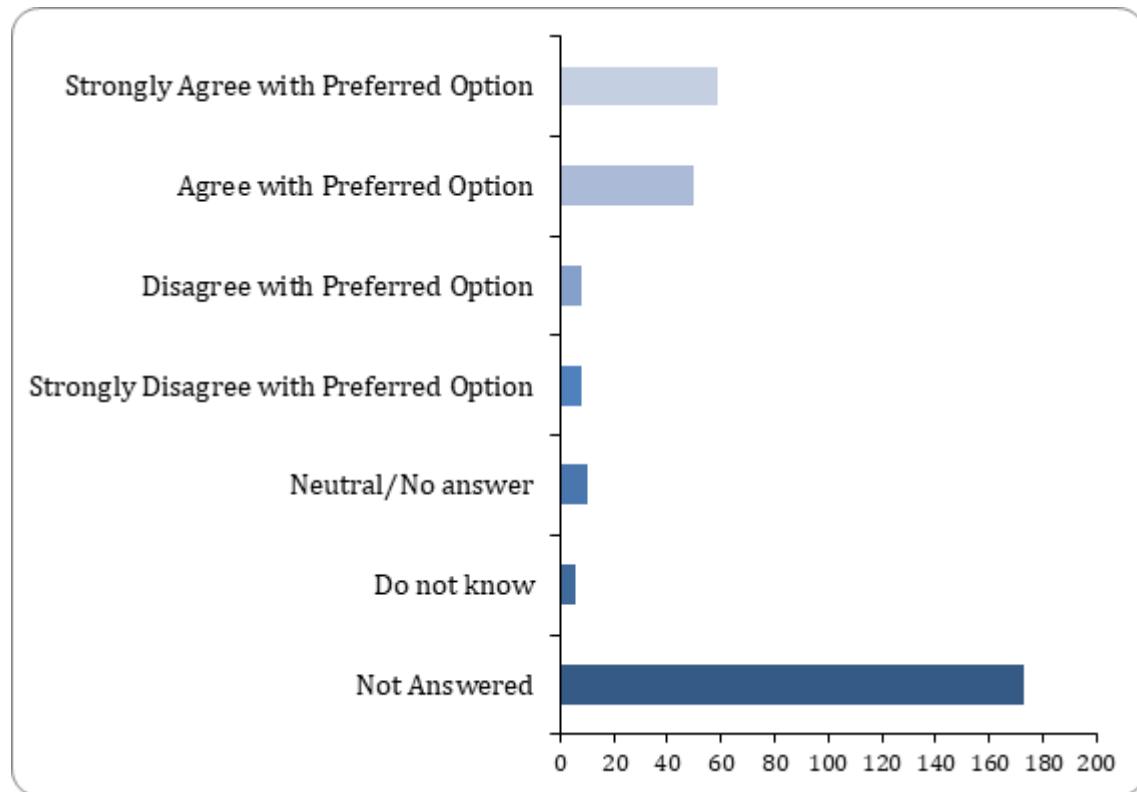


| Option | Total | Percent |
|-------------------|-------|---------|
| Strongly Agree | 374 | 41.05% |
| Agree | 338 | 37.10% |
| Neutral | 82 | 9.00% |
| Disagree | 44 | 4.83% |
| Strongly Disagree | 40 | 4.39% |
| Do not know | 15 | 1.65% |
| Not Answered | 18 | 1.98% |

All Public Responses - Draft Policy HD1

Please tell us what you think of policy options set 011a (draft policies HD1, HD2, HD3, HD4): Designated Heritage Assets. If you have any additional comments please put them in the comment box.

There were 141 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 59 | 18.79% |
| Agree with Preferred Option | 50 | 15.92% |
| Disagree with Preferred Option | 8 | 2.55% |
| Strongly Disagree with Preferred Option | 8 | 2.55% |
| Neutral/No answer | 10 | 3.18% |
| Do not know | 6 | 1.91% |
| Not Answered | 173 | 55.10% |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|------------------------------------|---|--|
| HD1-HD9 | Supportive | We strongly support these policies. Like those on green infrastructure, they should be given very strong weight in recognition of the outstanding heritage importance of the city as a whole and the contribution made by individual historic assets including many non-designated historic assets. | Noted, support welcomed. |
| HD1 | Should be reworded to reflect NPPF | It is noted that the draft policy states that 'substantial harm to or loss of significance of a conservation area should be wholly exceptional'. It is considered that the word 'wholly' should be removed from the policy drafting as this is not consistent with the wording of paragraph 214 of the NPPF. | The NPPF provides a national context. The policy has been combined with others relating to designated heritage assets and reworded. |
| HD1 | Objection | <p>Conservation Areas are not up-to-date and ineffective as many have large sections destroyed, so should be drawn to new boundaries, removing areas that no longer have anything to preserve.</p> <p>For example, Headington Hill "Conservation Area" includes Clive Booth Student Housing, Oxford Brookes Campus and modern housing estates, whereas much of Central Conservation Area, due to recent developments, has all the charm and atmosphere of Swindon, this is supported by NPPF Para 191.</p> <p>Almost all development in Conservation Areas will confer substantial benefit, by for example, providing more housing which will always be a "substantial public benefit" so Policy HD1 becomes ineffective.</p> <p>It is contrary to NPPF Para 201 which states several tests to be met which are omitted in the policy. Conservation area boundaries should be reviewed with a view to removing parts which have been destroyed.</p> | <p>The conservation areas are considered to remain relevant. They all contain newer development and will always be evolving, but the special characters that led to their designation in the first place remain relevant and it is not considered that parts of conservation areas in Oxford are 'destroyed'.</p> <p>Instead of repeating all of the NPPF, the Policy (no redrafted Policy HD3) refers to the criteria in paragraph 214 or equivalent if updated (was para 201).</p> |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--------------|---|-----------------|
| | | <p>Proposed modifications:</p> <ul style="list-style-type: none"> • Shrink Conservation Areas to parts where something remains to conserve. • Remove “substantial public benefits” clause, revert to NPPF para. 201 etc. • Update fluffy wording such as responds, considered, informed to specifics such as must not etc. • Add, (and consult), the Conservation Area Appraisals have not been added to the evidence base as they clearly have never been consulted in this Local Plan | |

Statutory Consultee Responses – Draft Policy HD1

Historic England

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|---------------------|---|---|--|
| HD1 | <p>Welcome the changes made to the policy. Only query relates to use of phrase “to avoid harm” in the paragraph at the top of p123. Is that phrase needed?</p> <p>Potentially it risks overlooking the potential to enhance the conservation area by responding sensitively. Also, it might make it</p> | We have removed the wording from the policy as suggested. | Amended policy and addressed in supporting text. |

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|--------------|---|------------------|---------|
| | harder to reach a balanced outcome, where harm is minimized. That being so, might “to avoid harm” be deleted? | | |

All Public Responses - Draft Policy HD2

| Draft policy | Topic | Summary of comments | Response |
|-----------------------|---|--|---|
| HD2: Listed Buildings | Detailed wording comments about requirement to enhance. | The drafting of the policy risks implying that there is a policy requirement to 'enhance'. The NPPF para 210 encourages enhancement where desirable but does not mandate it (in line with the Act). Should be rebalanced so the statutory duty to preserve significance is clearly identified as the primary requirement, with enhancement presented as a desirable aspiration, rather than an obligation. | Re-drafted Policy HD3 covers all designated heritage assets and refers to the NPPF rather than incorporating its wording. |

Statutory Consultee Responses – Draft Policy HD2

Historic England

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|---------------------|--|---|--|
| HD2 | Welcome the changes made to the policy. In the opening paragraph, suggest integrating the concept (from the NPPF) that the more important the asset, the greater the weight should be. Note typo "ess than substantial" Also, maintain a concern about referring to compensation in the context of harm to heritage significance. Suggest a different way of framing this in terms of the delivery | Happy to take these suggestions on board. | Policy HD3 refers to the significance of the asset. Deletion of wording in relation to compensation. Typo amended. |

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|--------------|---|------------------|---------|
| | of other heritage benefits (<i>suggested wording provided</i>). | | |

All Public Responses - Draft Policy HD3

No public comments about draft policy HD3.

Statutory Consultee Responses – Draft Policy HD3

Historic England

| Draft Policy | Summary | Response | Outcome |
|--------------|--|---|--|
| HD3 | Welcome changes to policy, but question whether the policy could be tailored further to be more locally specific and whether more context can be added to inform decision making. Trust that the detailed wording in the supporting text that was agreed through the SoCG for LP2040 will be carried forward. (<i>Suggested wording provided in appendix to their comments</i>). | The draft of the policy was absent of the supporting text which is where we planned to add more context, including detail we previously agreed for the LP2040. This has now been incorporated into the draft supporting text. | Supporting text drafted with additional contextual details. Policy wording updated to incorporate HE's suggestions. |

All Public Responses - Draft Policy HD4

| Draft policy | Topic | Summary of comments | Response |
|--------------------------|---|--|---|
| HD4: Scheduled Monuments | Detailed wording comments about requirement to enhance. | The requirement that a proposal should identify 'enhancement to the significance of the Scheduled Monument (including its setting) where possible' goes beyond the Act, which focuses on preservation, and the NPPF which encourages but does not require enhancement. | Policy HD3 is re-worded with greater reference to the NPPF, rather than incorporating its wording within the Plan and to cover all designated assets. |

Statutory Consultee Responses – Draft Policy HD4

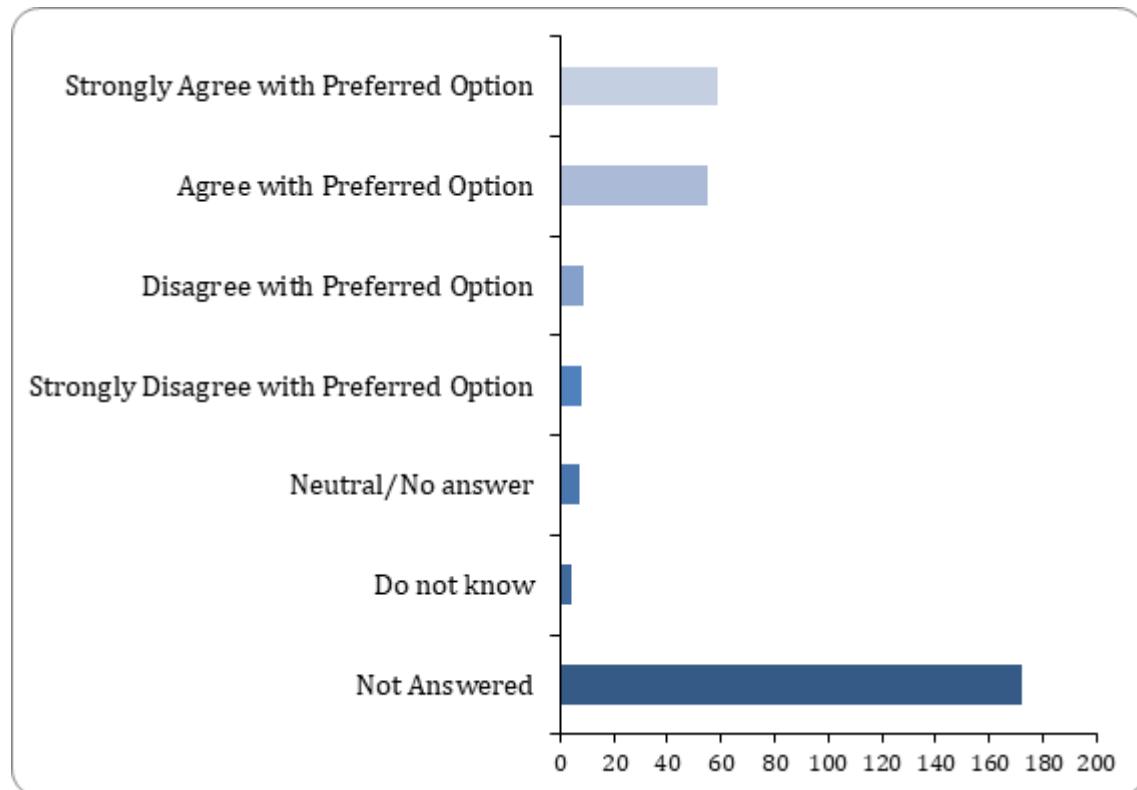
Historic England

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|---------------------|--|--|---|
| HD4 | Welcome changes made to the policy. As with HD2, maintain a concern about referring to compensation in the context of harm to significance and offer alternative wording for consideration (<i>suggested wording provided</i>) | Happy to take suggestion on board as with HD2. | Re-drafted Policy HD3 covers all designated heritage assets and refers to the NPPF rather than incorporating its wording. |

All Public Responses - Draft Policy HD5

Please tell us know what you think of policy options set 011b (draft policy HD5): Non Designated Heritage Assets. If you have any additional comments please put them in the comment box below.

There were 142 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 59 | 18.79% |
| Agree with Preferred Option | 55 | 17.52% |
| Disagree with Preferred Option | 9 | 2.87% |
| Strongly Disagree with Preferred Option | 8 | 2.55% |
| Neutral/No answer | 7 | 2.23% |
| Do not know | 4 | 1.27% |
| Not Answered | 172 | 54.78% |

| Draft policy | Topic | Summary of comments | Response |
|--------------|---|--|---|
| HD5 | Policy wording should reflect NPPF | <p>It is agreed that there are buildings within the City that do not warrant formal Listing but make an important contribution to the character and appearance of the area and therefore, should be afforded due regard in considering development proposals. The policy as proposed requires the impact of the development upon the significance of a non-designated heritage asset to be weighed against the 'public benefits' of the scheme. This is out of alignment with the requirements of the NPPF (paragraph 203) which states that 'a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the asset'. The policy should reflect this test rather than the test associated with designated heritage assets.</p> | Wording removed to align with the NPPF. |
| HD5 | Allow for individual nominations for non-designated heritage assets | <p>Historic England in Advice Note 7 (2nd Edition) clearly states that individual non designated heritage assets can be identified within conservation areas and makes the distinction between CA protection and NDHA protection via LA Registers. Other LA's have encouraged local people to get involved in identifying and surveying NDHA's in their conservation areas.</p> <p>The current rules the City Council have set out for registration have created a 2 tier system with communities and citizens outside CA's given preferential treatment allowing them to nominate possible NDHA's for consideration to be registered. This is because it is very possible that a CA appraisal will not identify all of the heritage assets might be valued by local people in that area and Conservation Area Protections differ in their criteria from the criteria that can be applied to NDHAs.</p> | The Policy is clear that the Oxford Heritage Asset Register is only one way that non-designated heritage assets may be identified. A non-designated heritage asset is considered in the same way in a proposal however it is identified. There is no greater (or lesser) protection for those on the OHAR, or indeed for those listed in a conservation area appraisal. |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--------------|--|-----------------|
| | | <p>NDHA are usually criteria are more akin to those of formal listing which identify more than just external appearance for protection. The NDHA Register, like listing, can allow for interiors and special features within a buildings structure to be protected for instance. CA protection does not.</p> <p>So I ask that the Local Plan 2042 Policy HD5 includes a provision to allow individual non designated heritage assets to be nominated by members of the public or communities even if they are in a CA. Then that the criteria for nomination be modified to allow this also. This would remove the in equality that I have pointed out and probably add and protect many assets and their special features which being in a CA cannot.</p> | |
| HD5 | Comment | Goal seems to write a report rather than define the degree of harm that would acceptable. | Comment noted. |

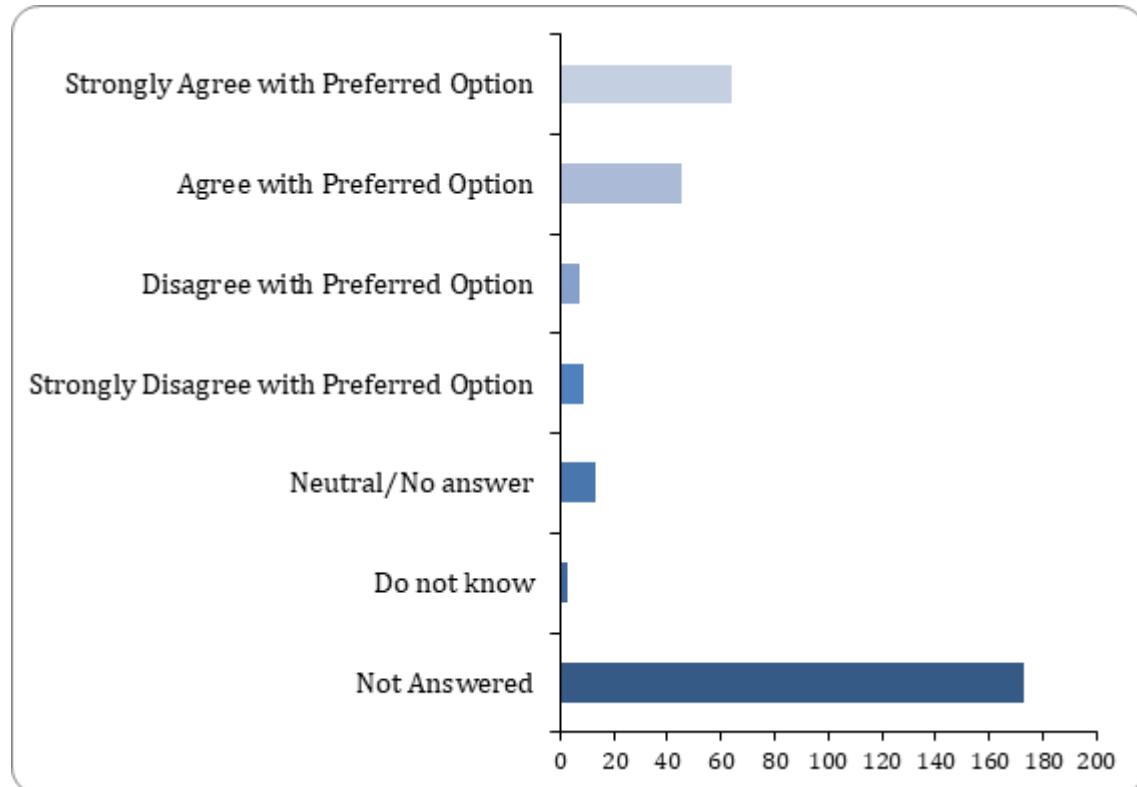
Statutory Consultee Responses – Draft Policy HD5

No statutory consultee comments on draft policy HD5.

All Public Responses - Draft Policy HD6

Please tell us what you think about policy options set 011c (draft policy HD6): Archaeology. If you have additional comments please put them in the comment box.

There were 141 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 64 | 20.38% |
| Agree with Preferred Option | 45 | 14.33% |
| Disagree with Preferred Option | 7 | 2.23% |
| Strongly Disagree with Preferred Option | 9 | 2.87% |
| Neutral/No answer | 13 | 4.14% |
| Do not know | 3 | 0.96% |
| Not Answered | 173 | 55.10% |

| Draft policy | Topic | Summary of comments | Response |
|--------------|-----------------------------------|--|--|
| HD6 | Support with suggested amendments | <p>CPRE would like to see policy “proactively” map areas of known archaeological interest. We support the general intent to not allow development unless harm is removed, although feel the wording of the sentence in relation to mitigation is unclear and ask for this wording to be revisited:</p> <p>“mitigated to an appropriate level, conserving the remains and the significance of the archaeological or paleoenvironmental asset better revealed and understanding of that significance enhanced (by agreed measures).”</p> | <p>The central area has such a concentration of archaeology of such high significance that it is very likely to be present. Other areas do not have quite such a concentration over a particular area, but the potential is across such large areas of the city that to map too many particular areas may falsely give the impression that areas outside them may have little interest.</p> <p>Wording re mitigation has been checked for clarity.</p> |
| HD6 | Comment | The policy reads as if central Oxford is the only place of any importance. Headington is far older as a settlement and manor, for example. | The policy explicitly refers to the ‘City Centre Archaeological Area, on allocated sites where identified, or elsewhere where archaeological deposits and features are suspected to be present’. |
| HD6 | Policy not strong enough | Language should be stronger. Should require professional site-based assessments. Should require protection rather than talking of ‘mitigation’ which admits harms. | The policy approach needs to be proportionate and cannot assume that the presence of archaeology will prevent development. |
| HD6 | Have no policy | Rely on national policy for archaeology only. The local elements (the City Centre Archaeological Area, mandating desk-based assessments for any ‘suspected’ deposits and whole- | The significance of archaeology in Oxford means that a bespoke |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--------------------------|--|---|
| | | college management plans) turns normal due diligence into a costly pre-planning obstacle course that discourages brownfield development. | policy that responds to this is required. |
| HD6 | Support | Good and clearly expressed. | The support is welcomed. |
| HD6 | Flood risk and basements | Basement additions to university/college areas should be resisted on drainage ground wherever appropriate, as well as archaeological ones. | Flooding and drainage issues are dealt with in separate bespoke policies. |

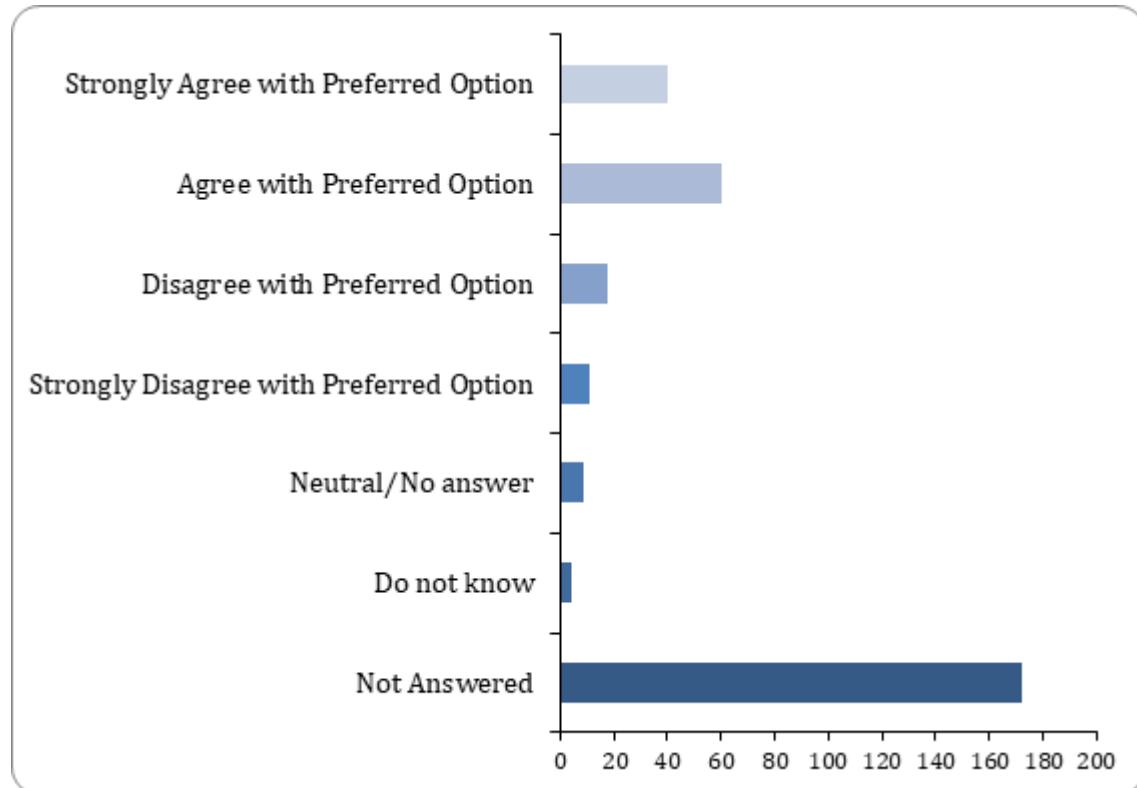
Statutory Consultee Responses – Draft Policy HD6

No statutory consultee comments on draft policy HD6.

All Public Responses - Draft Policy HD7

Please tell us what you think of policy options set 011d (draft policy HD7): Principles of High Quality Design of Buildings. If you have any additional comments please put them in the comment box.

There were 142 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 40 | 12.74% |
| Agree with Preferred Option | 60 | 19.11% |
| Disagree with Preferred Option | 18 | 5.73% |
| Strongly Disagree with Preferred Option | 11 | 3.50% |
| Neutral/No answer | 9 | 2.87% |
| Do not know | 4 | 1.27% |
| Not Answered | 172 | 54.78% |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|---|--|---|
| HD7 | Strongly support | ONV supports high quality design in the city. This should be proportionate to the location and setting of the proposed development and should recognise the form of development proposed. | Noted, welcome support. |
| HD7 | Support | Christ Church supports high quality design in the city. This should be proportionate to the location and setting of the proposed development, and also viability considerations. | Support for policy is welcomed. |
| HD7 | Support | Yes... and building should be built with a life expectancy of greater than 20-30 years! We have a city full of buildings that have lasted >500 years so new developments should be built with longevity in mind to reduce their environmental impact. | Support for policy is welcomed |
| HD7 | Should prioritise design checklist questions. | Design Checklist or Questions should include hierarchy of design priorities and consider various scales (major / minor) and types (residential / commercial) of development. The local plan should rely on either the checklist or the existing policy questions, not both, to avoid confusion and ensure policy compliance. | Elements of design should be considered in the round and can't be prioritised. The policy links to the checklist, where the detail is included. |
| HD7 | Objection | <p>Policy is ineffective. The vast majority of applications, namely, householders, are excluded from the necessity to provide even a basic rationale for the proposal.</p> <p>Modification proposed: Remove Householder application exception, this is covered by the proportionality clause.</p> | <p>Many of the detailed assessment criteria under this policy will not be applicable to householder applications, and a mandatory requirement will require additional work from the application while not bringing significant value. It should be noted that householder applications refer to small scale proposals such as extensions that</p> |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--------------|--|---|
| | | | are subordinate to existing buildings, and distinct from erection of new self-contained dwellings. |
| HD7 | | The policy has not reflected how new measures will meet the carbon emission reduction goal and how the design should cope with climate change. | The design checklist includes climate change resilience, carbon emissions and net zero building operations as considerations for assessing a proposal. The plan is to be read as a whole and this policy will not be applied in isolation. There are a number of environmental policies that are included in the plan, and they will be applied where relevant. |
| HD7 | | Alternative Option 2 is best as good design does not come from a checklist, but (for most development in Oxford being brownfield), from appraisal of the existing site and building and surroundings to find the effective solution. | Noted. |
| HD7 | | Agree with the principle; but the current approach to assessing "high quality" is fundamentally flawed, as shown by a number of developments in Oxford. For a start, the [design review] panel is not permitted to understand the local community within which the development sits, and makes its assessment based on some pretty pictures with no local context. It is also influenced by developers' assertions without testing them against local reality. Would like to see this changed and the whole panel approach rebooted. | Site visits occur in nearly all cases and understanding the local context is an important part of achieving high quality design. However, it is the case that the panel meetings actively involve the applicants, City Council |

| Draft policy | Topic | Summary of comments | Response |
|--------------|-------|---|--|
| | | | officers and the panel only, to keep focus on design issues. It is important to note this is only a part of the process of developing and assessing planning applications. |
| HD7 | | <p>"High Quality Design" is much too vague a term and useless in practice. Any planning consultant can demonstrate that any building, whatever its quality, is "high quality".</p> <p>It is a scandal that City policy has been so weak on heritage assets. It should be a fundamental principle that proposals should enhance and preserve the building affected and the area around it. There should be tight controls on materials, style and size to ensure that these are appropriate to the surrounding buildings and area.</p> <p>Conservation Area Appraisals must be produced for all Conservation Areas especially the Central City area which is still incomplete after many years and these should inform precise requirements in any area.</p> | <p>Applicants will have to demonstrate the merits of their proposals and provide justification for their choices through an assessment of specific criteria and design considerations. Pre-application discussions and where required design reviews are also part of the process of the assessment of applications.</p> <p>Conservation Areas in the city nearly all have had conservation area appraisals produced for them, including the Central City CA whose conservation area appraisal was adopted in November 2023.</p> |

| Draft policy | Topic | Summary of comments | Response |
|--------------|--------------------|---|--|
| HD7 | | <p>"Responsive to the site" is often cited in rejecting designs of increased bulk and massing relative to the existing building or the nearby street scene.</p> <p>This suppresses densification, which forgoes increased housing capacity, which we are severely lacking, and particularly increased housing capacity at the most environmentally-sustainable locations.</p> <p>We should explicitly call out circumstances where increased height, bulk or massing are appropriate in order to deliver more housing than could be achieved at present building height and mass--</p> <ul style="list-style-type: none"> - Nearby (not necessarily immediately neighbouring) to other buildings of comparable size - Close to public transport links and amenities -- this would likely in practice mean close to district centres - Out of the immediate proximity of highly sensitive heritage assets - In locations with a CPZ or other parking management such that the consequences of increased motor traffic can be managed | <p>Densification and the efficient use of space are supported in the plan where they are suited to the setting and create no adverse impact on the local and city-wide character, and where there is no adverse impact on the amenity of the occupiers of development or the adjoining uses. The plan includes an efficient use of land policy (policy HD8) and a views and building heights policy (policy HD9) which in combination with the High Buildings Study sets out locations in the city that are best suited for added height, and the criteria that proposals will be assessed against to avoid unnecessary harm to the unique visual and spatial environment of the city.</p> |
| HD7 | No policy required | <p>Government interference in decoration just seems unnecessary. Even for the purpose of promoting aesthetics (which is of dubious value relative to the practical purposes buildings serve), variety is valuable and having a checklist seems potentially counterproductive.</p> | <p>Local authorities are required to prepare design guides or codes consistent with the principles set out in the National Design Guide</p> |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--------------|----------------------------|---|
| | | | and National Model Design Code. It is a good way to set out the principles of good practice in design and placemaking, which go beyond just visual appearance. It can also allow for requirements to be tailored to specific local contexts. There is no fixed format, and the checklist we seek to use functions as a series of prompts for applicants to consider if key principles have been followed. They can also be a useful starting point for discussions with officers at early design stages to address any points of concern or contention. |

Statutory Consultee Responses – Draft Policy HD7

Oxfordshire County Council

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|---------------------|----------------------------|-------------------------|----------------|
| Policy HD7 | Strategic Planning | | |

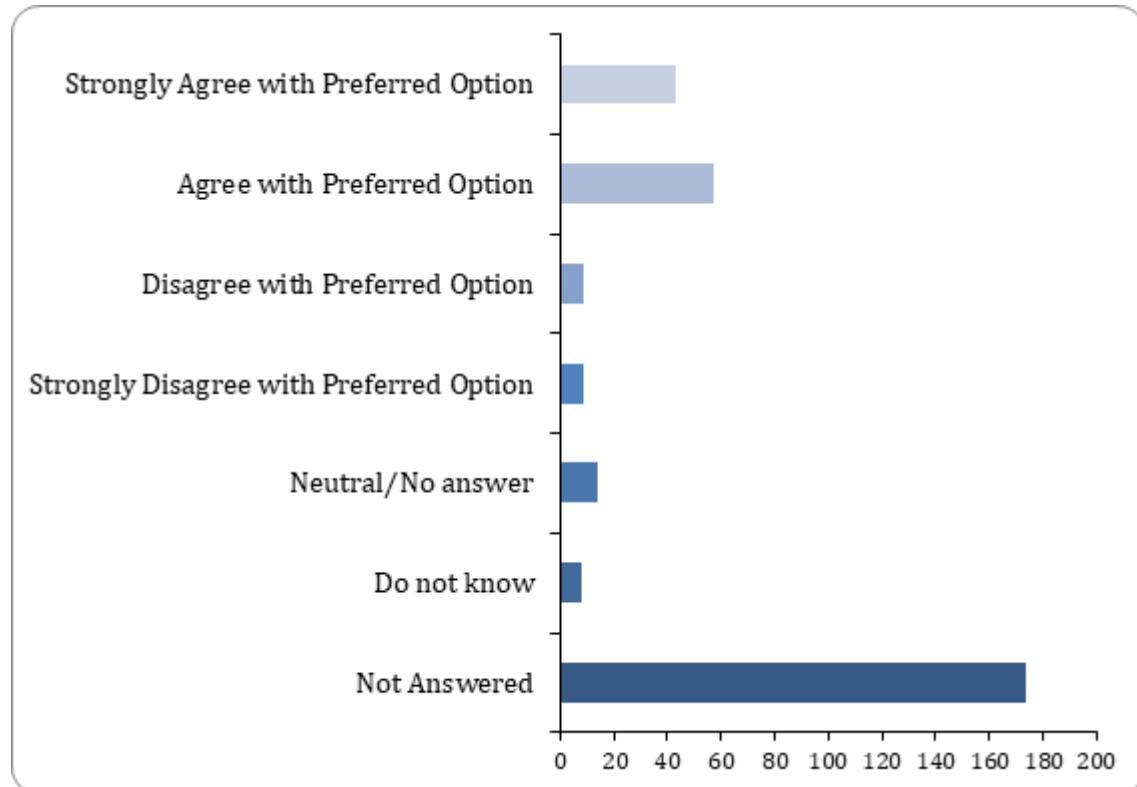
| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|--------------|---|---|---|
| | <p>Appendix 1.1 appears to be comprehensive and includes consideration of accessibility and sustainable transport as well as climate change and net zero, use of sustainable materials and thoughts regarding future proofing. As such, we welcome the approach given to this Appendix.</p> <p>Urban Design (Placemaking)</p> <p>Paragraph 6.30 - Design quality must also be thought about in relation to the ongoing stewardship and maintenance once delivered, particularly in relation to public realm.</p> <p>Paragraph 6.30 - spelling mistake - The Council has a Design Review Panel wthat can give advice so that designs can be reviewed and improved at the informative stage prior to the formal determination of the application</p> <p>Paragraph 6.31 - The function and uses of streets, spaces, buildings need to be considered</p> | <p>Noted.</p> <p>Maintenance arrangements are considered in Policies, G2, G5, G6 relating to GI and designated ecological sites, policy G8 – SuDS, R2 – Embodied Carbon, and numerous references are included within the design checklist itself.</p> <p>Noted.</p> | <p>No Action Required</p> <p>No Action Required</p> <p>Oxford City Action: Review typos</p> |

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|--------------|---|---|--|
| | <p>as part of the design and not purely the appearance.</p> <p>Paragraph 6.31 - spelling mistake - Building for a Healthy Life (BHL) is the latest edition of one of the most widely used design guides used in England and has, as its emphasis, healthy placemaking</p> <p>Paragraph 6.34 - could there be a reference to enhancing the natural environment, not just protecting it.</p> <p>The background paper references an option E in the initial sustainable appraisal screening of options, which does not exist.</p> | <p>Noted.</p> <p>Noted.</p> <p>Polices G1-G6 specifically address the natural environment.</p> <p>Noted. We will update the background papers to support the next consultation stage.</p> | <p>No Action Required</p> <p>Oxford City Action: Review typos</p> <p>No Action Required</p> <p>Oxford City Action: Review background paper</p> |

All Public Responses - Draft Policy HD8

Please tell us what you think of policy options set 011e (draft policy HD8): Efficient Use of Land. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 43 | 13.69% |
| Agree with Preferred Option | 57 | 18.15% |
| Disagree with Preferred Option | 9 | 2.87% |
| Strongly Disagree with Preferred Option | 9 | 2.87% |
| Neutral/No answer | 14 | 4.46% |
| Do not know | 8 | 2.55% |
| Not Answered | 174 | 55.41% |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--------------------------------------|---|---|
| HD8 | Strongly support | <p>Supports the preferred option of a policy requiring development proposals to make the best use of site capacity, in a way that is compatible with both the site itself and the surrounding area, with building heights and massing at least equivalent to the surrounding area.</p> <p>NPPF paragraph 129 sets out that planning policies and decisions should support development that makes efficient use of land. This policy will support intensification of existing employment sites where there is the opportunity to achieve increased scale and density to support economic growth in Oxford.</p> | Support for policy is welcomed. |
| HD8 | Support in principle - Clarification | <p>The Universities and Network Rail support the principle of maximising efficient use of land and maximising capacity, but would draw attention to the final paragraph of the draft policy. It would be helpful to understand how these densities relate to different typologies to ensure these do not inadvertently reduce efficiencies.</p> | There is no reason that setting out indicative minimum capacities should inadvertently reduce efficiencies. |
| HD8 | Design-led approach | <p>The draft policy states that 'very-high density' residential development will indicatively be taken as over 100dph. We acknowledge the reference to 'over' 100dph is a starting point not maximum which is positive in the context of housing need and limited land availability. That said, we remain of the view that it should be clearly expressed within the main policy wording that a 'design-led' approach should be taken, based on the opportunities and constraints of a site and assessment of impacts. It is considered that this is the only approach that is capable of delivering the intention of the policy to 'make efficient use of land and maximise capacity'.</p> | Policy HD7 sets out the requirement for high-quality design. |
| HD8 | Policy requirements when creating | <p>Draft Policy HD8 relates to granting planning permission only where development proposals make efficient use of land and maximise capacity and that sites across the City will be capable of</p> | Allocated sites have their own bespoke policies in the plan, which contain site and context- |

| Draft policy | Topic | Summary of comments | Response |
|--------------|-----------------------------|--|---|
| | new transformative context. | <p>accommodating development at an increased scale and density to their surroundings. In contrast, draft Policy HD9 sets out that planning permission will only be granted for development that will retain the special significance of views of the historic skyline, both from within the historic core area and from outside the historic core area.</p> <p>As per previous written representations, we would encourage further guidance in relation to strategic site allocations and large areas which are planned for intensification and transformation such as the Botley Road Retail Park, which will create a new context because of their size and scale in draft Policy HD8. The Plan should make reference to and recognise the fact that development at strategic sites need to acknowledge existing context but also have the opportunity to create new transformative context.</p> | specific guidance on appropriate type and quantum of development and design requirements – including density. |
| HD8 | Suggested amendments | <p>Car infrastructure, roads, driveways and garages are the single biggest cause of inefficient use of land, occupying space that could be a bedroom or extension, yet this not acknowledged anywhere.</p> <p>Modification proposed: The phrase “<i>is informed</i>” is practically meaningless, as is “<i>does not substantially impact</i>”</p> <p>Remove Para e) “opportunities for net zero carbon design” as it is unrelated to the topic, also remove, f) “flood risk” for the same reason.</p> <p>Should include an exemption for conservation areas.</p> | Urban design principles were used to determine the indicative density figures. It is a holistic approach that takes into consideration factors that are deemed to be relevant in the context of the built environment. E.g. net zero carbon design may have implications on siting, height, massing etc and flood risk may impact the amount of developable land on a site. |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|---------------------------------|---|---|
| HD8 | Support | The aims of this draft Policy are supported, including building at appropriate densities as it is an important component of sustainable development. Making efficient use of any land in the City is a priority. | Support noted and welcomed. |
| HD8/ HD9 | Conflicting policy requirements | <p>Policy HD8 supports efficient use of land and maximising densities, while Policy HD9 helps protect the setting of Oxford, including its historic skyline, and views into and out from the historic core area.</p> <p>Encourage Local Plan to provide further guidance about how strategic allocations (inc. Osney Mead), can balance these competing policy interests and delivery required benefits and intensification.</p> <p>OUD generally encourages the Local Plan to recognise that large-scale redevelopment / regen. projects need to acknowledge the existing context and can also create new transformative contexts.</p> | <p>Policies HD8 and HD9 (HD2 and HD6 in the Submission Draft Plan) do not inherently contradict as it is possible to make efficient use of land/ increase densities while responding to and protecting the historic skyline. Policy HD6 sets out the process and tools which help to limit harm to the skyline from development. Site allocation policies and Area of Focus policies provide clarity around redevelopment opportunities and areas where additional growth is encouraged/ expected. Note the point about further clarity in strategic allocations.</p> |
| HD8 | Should go further | <p>There should be densification outside of the centre as well as inside it.</p> <p>Arterial roads are lined with low-density housing but they are highly accessible and justify an urban scale of development. They should be lined with minimum four-storey blocks of flats and offices with 100dph+ all along them arterial roads (except in conservation areas) not just in the district centres that are along them.</p> <p>Suggest 80dph suburban, 120dph gateways, 200dph centres.</p> | <p>The minimum indicative capacities do represent densification.</p> <p>The character of arterial roads does vary considerably. Some parts of arterial roads, near the ring road, will be gateway sites, but between these and the</p> |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--------------|---|--|
| | | | centres, very high densities will not always be appropriate. The suggested densities are very high and not considered feasible. |
| HD8 | Object | <p>Stop interfering with development.</p> <p>Do not set minimum densities as they lead to poor design and prevent low densities that may be appropriate.</p> <p>Too many buildings out of keeping with height of surroundings and add to existing problems of infrastructure and amenity.</p> <p>Need to be careful- justified controversy when the University built high-rise buildings that damaged view in and around Port Meadow.</p> <p>The centre brings tourists to Oxford and provides economic benefit, which as it risk if it is allowed to deteriorate further (it is already harmed by increased heights and sizes).</p> <p>Open spaces are important. Green sites should have more retained. This affects density.</p> | <p>The policy does have enough flexibility to allow lower densities if it can be justified that they are more appropriate because of the context of the site.</p> <p>The densities do allow for amenity space, green space, etc.</p> |

Statutory Consultee Responses – Draft Policy HD8

South Oxfordshire District Council and Vale of White Horse District Council

| Policy/Topic | Summary of Comments | Response | Outcome |
|---------------------|--|--|---|
| HD8 & HD9 | We welcome the minimum density targets, which responds to concerns raised by South Oxfordshire and Vale of White Horse. Supporting evidence to justify them is | A background paper explaining the rationale for the densities will be published. Density of course | Background paper explaining densities to be published. Template for site capacity assessments |

| Policy/Topic | Summary of Comments | Response | Outcome |
|--------------|--|--|--|
| | needed. HD8 and HD9 may be contradictory as HD9 may restrict density in key locations. | is never unlimited and should always be design-driven. | to be shared ahead of next consultation stage. |

Historic England

| Draft Policy | Summary | Response | Outcome |
|--------------|---|--|-----------------|
| HD8 | Strongly encourage more nuanced wording in the opening paragraph of HD8. Background paper 11 summarises the preferred option as “Require that proposals make the best use of site capacity, taking into account the surrounding area, building heights, massing and other contextual factors such as heritage and green infrastructure”. While this is a reasonable description of HD8 in OLP 2040, the policy’s emphasis has changed in OLP 2042. There may be circumstances where the expectation as stated in the revised policy, especially regarding scale, will not be realistic. Some form of caveat is needed. We suggest adding “most” to the opening paragraph. | We agree with the comment in general and will update the wording, though would propose slightly different wording. | Policy updated. |

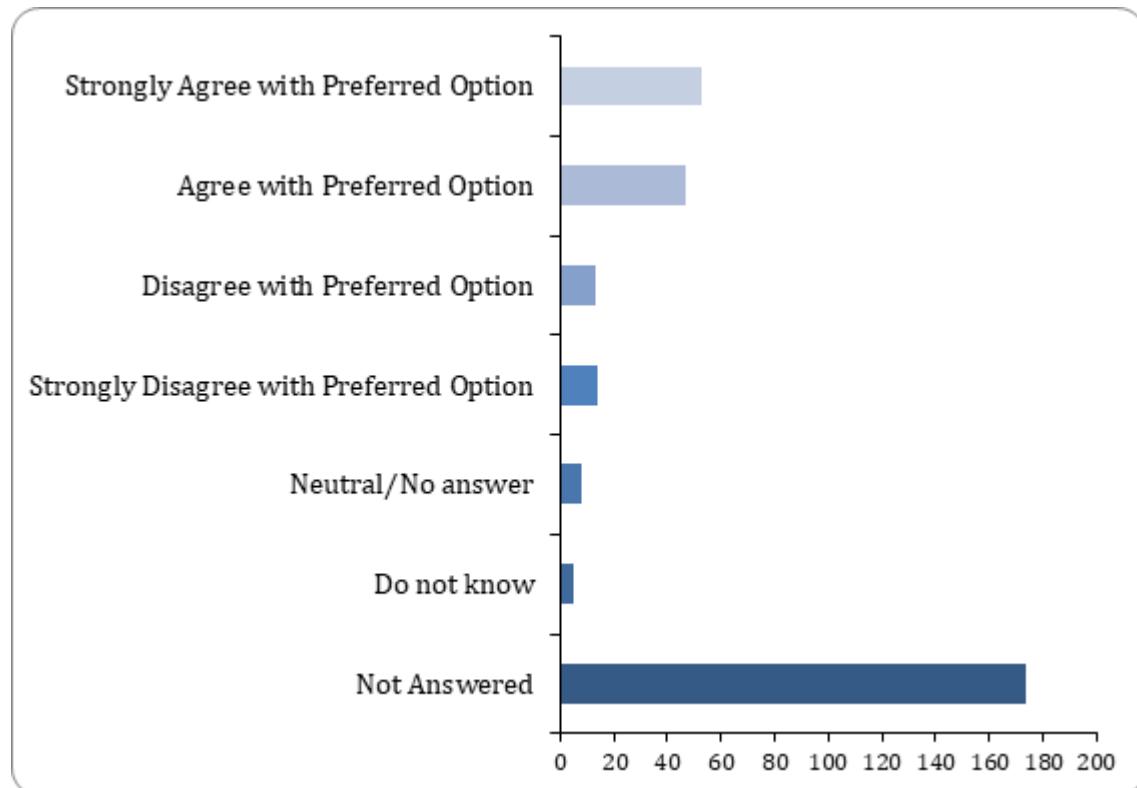
Oxfordshire County Council

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|---|---|---|---|
| Policy HD8 Making Efficient Use of Land | <p>Strategic Planning</p> <p>This policy approach is supported by the County Council as it will help reduce the unmet housing need identified in the plan. The approach to densities in a hierarchical manner depending on accessibility is welcomed as it should reduce reliance on private vehicles and increase access to sustainable modes of transport.</p> <p>It is important however, to make it clear that this policy works in tandem with draft Policy HD7 and the principles included in Appendix 1.1. We encourage the City Council to make explicit reference to this, to ensure high quality developments.</p> <p>Urban Design (Placemaking)</p> <p>Paragraph 6.36 - 'Transport hubs generally enable a greater density to be assumed.' - The same should apply to areas with key services such as hospitals, education, leisure/shopping - not just transport. Generally, people want to live near services, therefore there will be a greater demand for housing, increasing density.</p> | <p>Noted.</p> <p>We do not propose to make an explicit reference in the plan to that effect. The plan should be read as a whole and relevant policies applied in the decision-making process.</p> <p>Noted.</p> | <p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p> |

All Public Responses - Draft Policy HD9

Please tell us what you think of policy options set 011f (draft policy HD9): Views and Building Heights. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 53 | 16.88% |
| Agree with Preferred Option | 47 | 14.97% |
| Disagree with Preferred Option | 13 | 4.14% |
| Strongly Disagree with Preferred Option | 14 | 4.46% |
| Neutral/No answer | 8 | 2.55% |
| Do not know | 5 | 1.59% |
| Not Answered | 174 | 55.41% |

| Draft policy | Topic | Summary of comments | Response |
|--------------|--|---|---|
| HD9 | Support but VuCity requirement should be deleted | <p>The aims of policy HD9 in terms of the impact of development upon views into and out of the City are acknowledged and supported by Mansfield College and ONV.</p> <p>However [the policy] requires the use of specific software (VuCity). It is not appropriate for a Local Plan to push a particular brand of software. This puts undue costs onto projects especially where an alternative modelling software is already being used by the applicants. This reference should be deleted, and the policy simply refer to the use of an appropriate 3D model. However, it is welcomed that the Council has introduced an acknowledgement that the software model may change over time.</p> | <p>The LPA has a licence with VuCity software to view the submitted 3D models. Alternative or generic software may not be compatible with the Council's systems which is why the policy is specific in its requirement for VuCity.</p> |
| HD9 | Rewording to reflect NPPF | <p>Previous representations submitted on behalf of ORVIL in response to the Reg 19 consultation on the LP2040) states that Policy HD9 should be revised to reflect the NPPF and the guidance as set out in GLVIA 3rd edition. It is acknowledged that (part e) of the draft policy references this guidance. However, it is considered that replacing 'special significance' in the first paragraph of the policy with 'important characteristics' would more appropriately respond to this guidance.</p> <p>It is considered that the word 'bulk' should be removed from the following sentence 'Development above this height must be limited in bulk and must be of the highest design quality'. The meaning of the word bulk can be overly interpreted, and it is considered unhelpful to include within the policy. Removal of the word 'bulk' does not dilute the intention of the policy due to the supporting explanatory paragraphs.</p> <p>Objection 2:</p> | <p>Views into and from within the city are important elements of the setting of heritage assets. The collection of buildings that make up the 'dreaming spires' are considered a heritage asset in their own right, and they do have special significance. There is sufficient detail in the supporting text that provides clarity to the policy.</p> <p>The word 'bulk' is considered to be vital to the policy, and its removal does not add to clarity, but would lead to greater potential for harm. It is a design term that will be used in the</p> |

| Draft policy | Topic | Summary of comments | Response |
|---------------------------------|-----------------------|---|--|
| | | <p>It should be made clear within the policy that a view is not itself a heritage asset and does not have significance in the same way a heritage asset does, as defined in the NPPF. It is considered that replacing 'special significance' in the first and sixth paragraphs of the policy with 'important characteristics' would appropriately respond to the guidance set out in GLVIA 3rd edition.</p> <p>It is also considered that 'limited in bulk and must be' should be removed from the following sentence 'Development above this height must be limited in bulk and must be of the highest design quality'. The meaning of these words can be overly interpreted and it is considered unhelpful to include within the policy. Removal of the words does not dilute the intention of the policy due to the supporting explanatory paragraphs and text which site alongside policy HD9.</p> | assessment of planning applications. |
| HD9: Views and building heights | Setting of View Cones | <p>The policy states that planning permission will not be granted for development proposed 'within a View Cone or the setting of a View Cone' if it would harm the special significance of the view. The use of the term 'setting' is problematic, as the NPPF defines 'setting' as the surroundings in which a heritage asset is experienced but View Cones are not designated heritage assets. They are intended to manage townscape character and safeguard settings of heritage assets visible within them. Reference to setting should be changed to 'townscape' or 'landscape context'.</p> | Views into and from within the city are important elements of the setting of heritage assets. The collection of buildings that make up the 'dreaming spires' are considered a heritage asset in their own right, and they do have special significance. There is sufficient detail in the supporting text that provides clarity to the policy. |
| HD9: Views and | Harm to View Cones | <p>The policy does not allow harm to the special significance of a view, but it should allow assessment of level of harm outweighed against benefits.</p> | The policy sets out guidance to inform design decisions about heights and to enable an |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|----------------------|---|--|
| building heights | | | understanding and detailed assessment of the impact of heights. |
| HD9 | Policy too rigid | The rigid height thresholds and extensive assessment requirements across all sites should be reviewed as this approach may restrict good design and sustainable development, especially in less sensitive areas. | There are no rigid height thresholds set out in the policy at all. The assessment requirements are proportionate and are most extensive for only specific circumstances. |
| HD9 | Support for policy | <p>We welcome this Policy's intention to 'retain the special significance of the historic skyline' of Oxford. However we are concerned that, as currently written, the Policy places almost exclusive emphasis on views of the Historic Core Area.</p> <p>...</p> <p>The Policy should explicitly prohibit such high buildings that would impinge on the skyline from Port Meadow, in order to ensure there is no repeat of the Castle Mill flats disaster and the more recent spoiling of Port Meadow views by the tall buildings at Oxford North.</p> | The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. Although the policy is in several parts, it is considered that this is clear, especially as the second part starts 'Applications for any building that exceeds 15m...' |
| HD9 | Support in principle | <p>We worked closely with the city council and other specialists to create the 'Assessment of the Oxford View Cone' Report in 2015, we strongly support reference to this report within the policy text.</p> <p>We are also pleased to see that reference is made to the view cones but also the wider setting of the views. This makes it clear that the 10 view cones do not provide a definitive list of all the views, and that the wider setting, or even views that do not fall within the 10 'official' view cones can also be sensitive and warrant a high level of protection.</p> | Policies HD1 and 2, in particular (HD3 in the Submission Draft Plan), do carefully consider the setting of heritage assets and may also be of relevance, alongside Policy HD9. |

| Draft policy | Topic | Summary of comments | Response |
|---------------------------------|-----------------------------------|---|--|
| | | The policy, or its supporting text, also needs to be clear on the difference between 'views' and historic 'setting'. | |
| HD9 | Objection | <p>Policy is ineffective as it only appears to refer to central Oxford and the dreaming spires, not views for example into, and out of the Old Headington Conservation area.</p> <p>The language needs to be clearer that it applies to ALL of Oxford where views exist either in or out. See also Ruskin Field SPE19.</p> | The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. Although the policy is in several parts, it is considered that this is clear, especially as the second part starts 'Applications for any building that exceeds 15m...' |
| HD9 | Inconsistent with national policy | <p>The preferred option for this policy states that 'Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view'. Under the terms of the policy, all levels of harm are unacceptable, regardless of the level of harm and the extent of any benefits which may outweigh that harm. This is inconsistent with national planning policy, in that it does not enable a balancing exercise to be undertaken. We would ask the Policy to be rebalanced.</p> | The policy sets out guidance to inform design decisions about heights and to enable an understanding and detailed assessment of the impact of heights. |
| HD9: Views and building heights | Setting of View Cones | <p>The policy states that planning permission will not be granted for development proposed 'within a View Cone or the setting of a View Cone' if it would harm the special significance of the view. The use of the term 'setting' is problematic, as the NPPF defines 'setting' as the surroundings in which a heritage asset is experienced but View Cones are not designated heritage assets. They are intended to manage townscape character and safeguard settings of heritage</p> | Views into and from within the city are important elements of the setting of heritage assets. The collection of buildings that make up the 'dreaming spires' are considered a heritage asset in their own right, and they do have special significance. There is |

| Draft policy | Topic | Summary of comments | Response |
|---------------------------------|--------------------|---|--|
| | | assets visible within them. Reference to setting should be changed to 'townscape' or 'landscape context'. | sufficient detail in the supporting text that provides clarity to the policy. |
| HD9: Views and building heights | Harm to View Cones | The policy does not allow harm to the special significance of a view, but it should allow assessment of level of harm outweighed against benefits. | The policy sets out guidance to inform design decisions about heights and to enable an understanding and detailed assessment of the impact of heights. |
| HD9 | Policy too rigid | The rigid height thresholds and extensive assessment requirements across all sites should be reviewed as this approach may restrict good design and sustainable development, especially in less sensitive areas. | There are no rigid height thresholds set out in the policy at all. The assessment requirements are proportionate and are most extensive for only specific circumstances. |
| HD9 | Support for policy | <p>We welcome this Policy's intention to 'retain the special significance of the historic skyline' of Oxford. However we are concerned that, as currently written, the Policy places almost exclusive emphasis on views of the Historic Core Area.</p> <p>...</p> <p>The Policy should explicitly prohibit such high buildings that would impinge on the skyline from Port Meadow, in order to ensure there is no repeat of the Castle Mill flats disaster and the more recent spoiling of Port Meadow views by the tall buildings at Oxford North.</p> | The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. Although the policy is in several parts, it is considered that this is clear, especially as the second part starts 'Applications for any building that exceeds 15m...' |

Statutory Consultee Responses – Draft Policy HD9

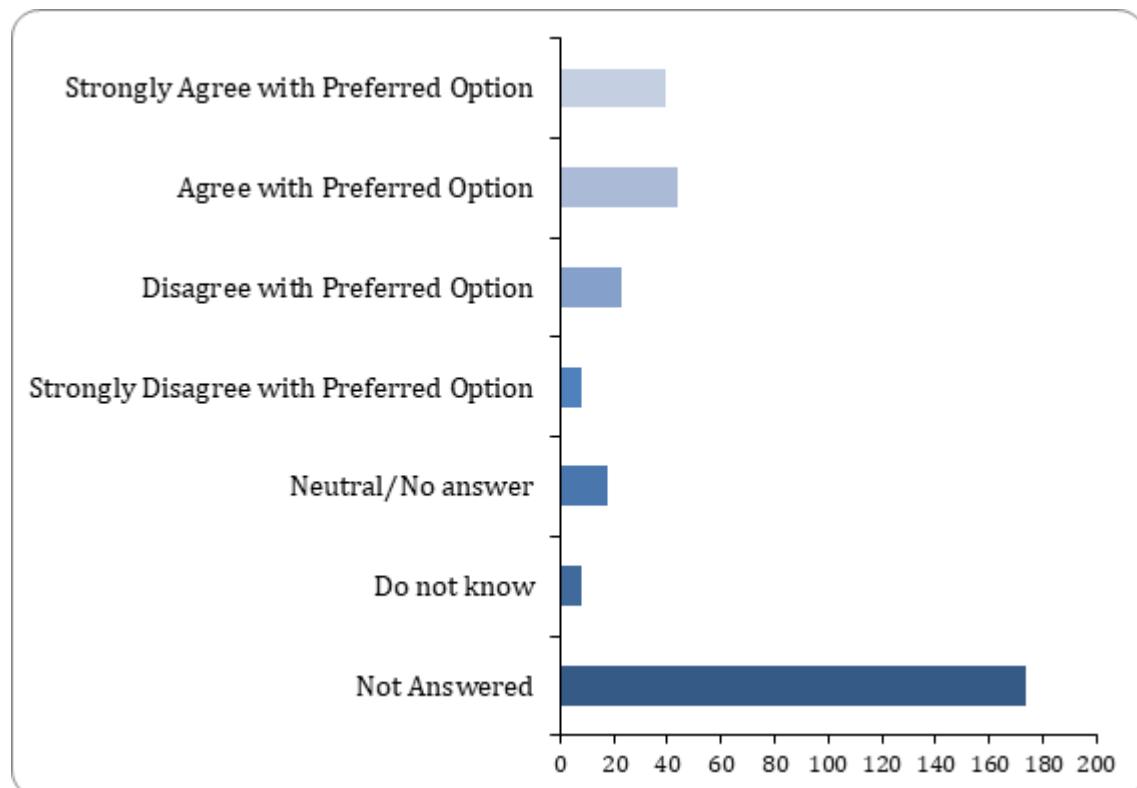
Oxfordshire County Council

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|---------------------------------------|--|---|---|
| Policy HD9 Views and Building Heights | <p>Urban Design (Placemaking)</p> <p>Paragraph 6.39 - Make reference to the view cones.</p> <p>Paragraph 6.47 - assuming views outside of Oxford City boundary do not extend into other districts besides Vale of White Horse? If not, reference other districts too.</p> | <p>View cones are referenced in paragraphs 6.45-6.47.</p> <p>Some views extend out of the city (e.g., Boar's Hill, Raleigh Park and Elsfield).</p> <p>Although the view may extend beyond the city boundary, the policies in the plan only apply with Oxford's administrative area.</p> | <p>No Action Required</p> <p>No Action Required</p> |

All Public Responses - Draft Policy HD10

Please tell us what you think of policy options set 010a (draft policy HD10): Health Impact Assessments. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 39 | 12.42% |
| Agree with Preferred Option | 44 | 14.01% |
| Disagree with Preferred Option | 23 | 7.32% |
| Strongly Disagree with Preferred Option | 8 | 2.55% |
| Neutral/No answer | 18 | 5.73% |
| Do not know | 8 | 2.55% |
| Not Answered | 174 | 55.41% |

| Draft policy | Topic | Summary of comments | Response |
|--------------|-----------------------------------|--|---|
| HD10 | Objection – Not in line with NPPF | <p>Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities - not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.</p> <p>A report " Healthier and Happier An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing.</p> <p>In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack adaptions such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder.</p> <p>For the future plan to be in line with national policy and effective, the following wording should be included within the policy:</p> <p><i>"Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment".</i></p> | <p>The requirement for HIAs for all major development proposals is not at odds with the benefits associated with Older Persons' Housing. No changes are required.</p> |
| HD10 (HIAs) | General comment | <p>The inclusion of a health impact assessment sounds great, but it should be made clear not just what should be included in an HIA, but how the information is to be used. Oxford is very short of space. If</p> | <p>As set out in the last paragraph of the policy, additional information</p> |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|---|---|--|
| | | HIA are to be used e.g. to push through developments which conflict with national policy in disadvantaged or working-class areas, then this is not a good thing. These can be huge documents. If they increase the volume of paper that councillors and residents have to plough through, it is important to clarify both their scope and their role. | and guidance can be found in the appendices and within the TAN. |
| HD10 | Several comments against including a policy | Several comments saying they don't agree with including a policy and one saying there are already lots of health-related tests as part of the plan and a HIA is an additional level in the way of development | The HIA is not overly onerous, but helps focus on health impacts. Creating a healthy places is fundamental, and overarching, so this focus is important. |
| HD10 | General comment | The inclusion of a health impact assessment sounds great, but it should be made clear not just what should be included in an HIA, but how the information is to be used. Oxford is very short of space. If HIA are to be used e.g. to push through developments which conflict with national policy in disadvantaged or working-class areas, then this is not a good thing. These can be huge documents. If they increase the volume of paper that councillors and residents have to plough through, it is important to clarify both their scope and their role. | HIA do not need to be extensive, but bring together elements of a proposal to show how they work together to impact health, and help show when any mitigations are needed. |
| HD10 | HIA policy scope too wide. | The HBF would agree that they are an essential part of plan making to ensure the Council understand the health outcomes it is seeking to achieve and creates a plan that seeks to deliver these. This should be achieved through the preparation of a whole plan HIA which will inform the Council that the policies it contains address the key health outcomes for the area. As the plan and the policies, it contains has been prepared to address the key health issues it is therefore unnecessary for future development proposals that accord with this plan to undertake a separate HIA. If a development meets the | HIA submitted in support of major development proposals will contain specific details relevant to the proposal which are in addition to the general overarching requirements of the Local Plan as a whole. |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--------------|---|---|
| | | policies in the plan, then it is by default addressing the health outcomes already identified by the Council. An HIA as part of the application would merely be repetition of the work the council has already undertaken. The only circumstance where an HIA may be appropriate would be for a larger unallocated site where the impacts may not have been fully considered by the council as part of the plan wide HIA. | |
| HD10 | Objection | Policy is not effective. The policy as drafted requires an assessment however it does not set a target for compliance. It is not clear how this is to be implemented (e.g., health impacts from increased traffic, loss of green space etc.). | As set out in the last paragraph of the policy, additional information and guidance can be found in the appendices and within the TAN. The TAN states “Planning officers will refer to Appendix 3 of the Oxfordshire HIA toolkit when assessing the submitted HIA report to ensure it adequately addresses all relevant health determinants.” |

Statutory Consultee Responses – Draft Policy HD10
 Oxfordshire County Council

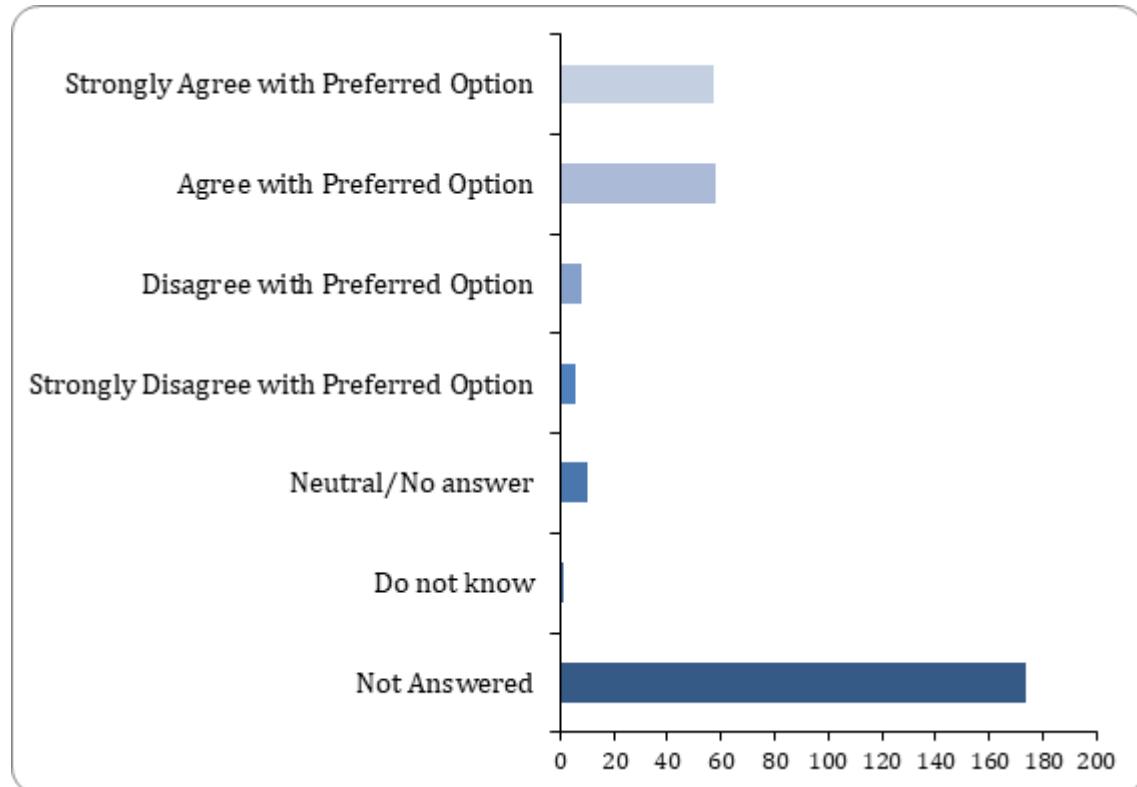
| Draft Policy | Summary | Response | Outcome |
|---------------------|----------------------|-----------------|----------------|
| Policy HD10 | Public Health | | |

| | | | |
|---------------------------|--|---|--|
| Health Impact Assessments | <p>Health Impact Assessments needs to be specific on the threshold for triggering the need for a developer to conduct an HIA. For example, requiring all developments which include 50 or more residential units, or over 1,000sq.m if commercial, to do an HIA, as is the case in Birmingham's Local Plan. This helps to remove any ambiguity over whether or not a development requires an HIA and should actually remove some of the extra burden that has been outlined as a potential negative consequence of this approach in the SA. As such, Option A is our preferred approach for this policy, on the basis that formal thresholds are included.</p> | <p>Policy HD10 requires an HIA to be submitted as part of major development proposals.</p> <p>Major developments (as defined in the NPPF,) are developments of 10 or more dwellings or 1,000sqm or more non-residential floorspace.</p> <p>Major development is not currently defined in the Glossary of the Local Plan</p> | <p>Oxford City Action:</p> <p>Consider whether Local Plan glossary should also include a definition of 'major development'</p> |
|---------------------------|--|---|--|

All Public Responses - Draft Policy HD11

Please tell us what you think about policy options set 010b (Draft Policy HD11): Privacy, Daylight and Sunlight. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 57 | 18.15% |
| Agree with Preferred Option | 58 | 18.47% |
| Disagree with Preferred Option | 8 | 2.55% |
| Strongly Disagree with Preferred Option | 6 | 1.91% |
| Neutral/No answer | 10 | 3.18% |
| Do not know | 1 | 0.32% |
| Not Answered | 174 | 55.41% |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--------------------------|--|---|
| HD11 | General comment | This policy should address dual aspect to provide shade. We consider a problem here is the insistence on little bits of garden for individual houses means that the quality of space is inevitably really limited. A greater emphasis on community living and shared spaces would enable a greater density with a much better quality of life. This is another reason to encourage the greater involvement of community land trusts. | Policy HD13 (HD10 in the Draft Submission Plan) supports shared outdoor amenity space. Assessments of daylight and sunlight which follow BRE guidance include shade (overshadowing) and dual/ single aspects openings. |
| HD11 | Policy unnecessary | Building Regulations and existing BRE guidance already secure reasonable daylight, sunlight and privacy for homes, while employers have clear incentives (and statutory duties) to provide acceptable working conditions. Extending a prescriptive local test to offices, labs and healthcare buildings would add another consultancy layer—modelling, section diagrams, over-shadowing studies—with material improvement in welfare, but it would raise costs, lengthen determinations and make the compact, mid-rise schemes Oxford needs harder to finance. A flexible, performance-based approach—using national benchmarks where issues genuinely arise—will protect amenity while keeping land available for the new homes and workspaces the city sorely lacks. | The policy requirements will relate specifically to residential development and sensitive workplaces such as schools. It is not intended to apply to most employment sites, and the reference to sensitive uses and potential safeguarding issues is considered to be clear enough. |
| HD11 | Too limiting | I'm concerned that this would limit density too much. | High densities can be achieved that still create decent homes with amenity space. When pushing density, these policies are even more important. |
| HD11 | Green spaces and density | [Include] access to green spaces | Provision of green spaces is addressed in other policies (e.g. G2, G3) |

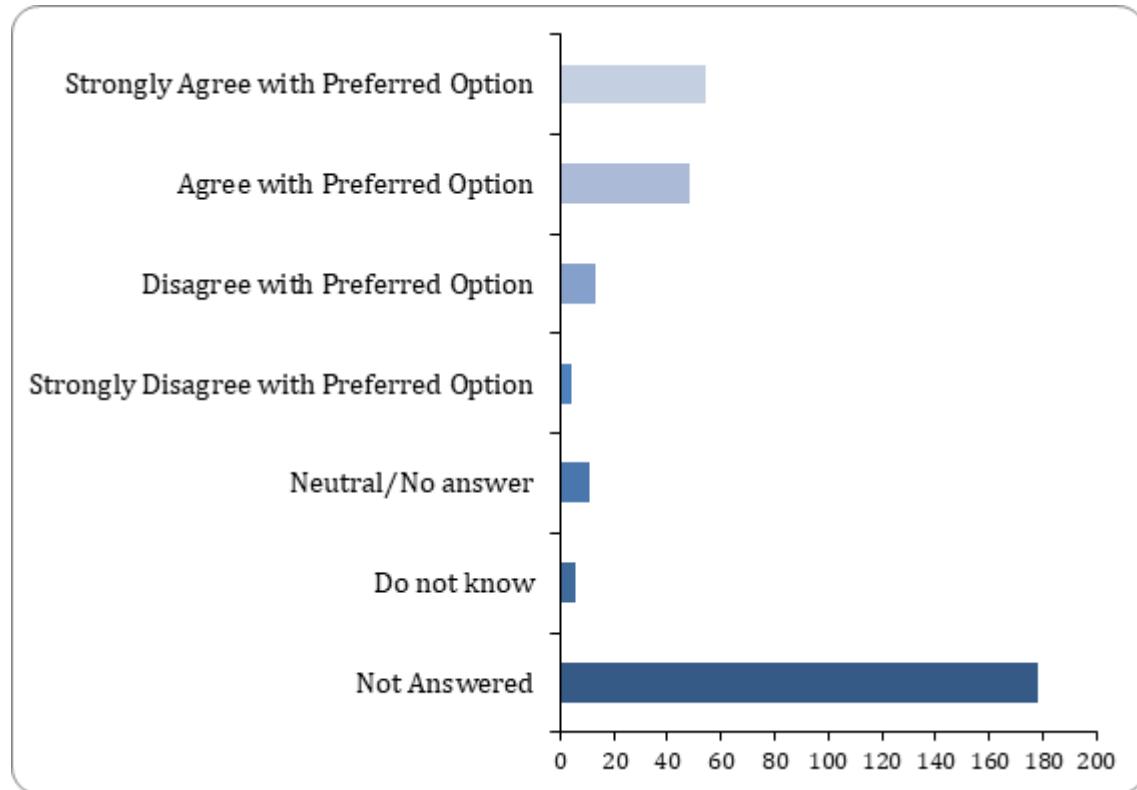
Statutory Consultee Responses – Draft Policy HD11

No statutory consultee comments on draft policy HD11.

All Public Responses - Draft Policy HD12

Please tell us what you think about policy options set 010c (draft policy HD12): Internal Space Standards for Residential Buildings. If you have any additional comments please put them in the comment box.

There were 136 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 54 | 17.20% |
| Agree with Preferred Option | 48 | 15.29% |
| Disagree with Preferred Option | 13 | 4.14% |
| Strongly Disagree with Preferred Option | 4 | 1.27% |
| Neutral/No answer | 11 | 3.50% |
| Do not know | 6 | 1.91% |
| Not Answered | 178 | 56.69% |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|-------------------------------|---|--|
| HD12 | No policy | <p>Do not apply national space standards in oxford.</p> <p>A substandard small bedroom must be better than being on the streets or in a hotel. The layout of some houses does not allow change to make rooms up to size.</p> <p>Do not interfere.</p> <p>Push prices upward, limiting choice for singles, key workers and students who may prefer a smaller studio.</p> | <p>This applies to new development. The pressing housing need does not justify poor standards of accommodation, and the standards are applicable to a range of tenure types.</p> |
| HD12 | More space is needed | <p>In communal areas- fixed seating and wider area of corridor or lobby space is not enough to support community living. Bigger and better planned shared spaces are needed.</p> <p>Expectation of remote working, need for study space, teenagers need more space.</p> | <p>Space standards are set nationally.</p> |
| HD12 | Ensure doesn't deter building | Support but must not deter building | <p>The policy approach has been included in the whole-plan viability testing.</p> |

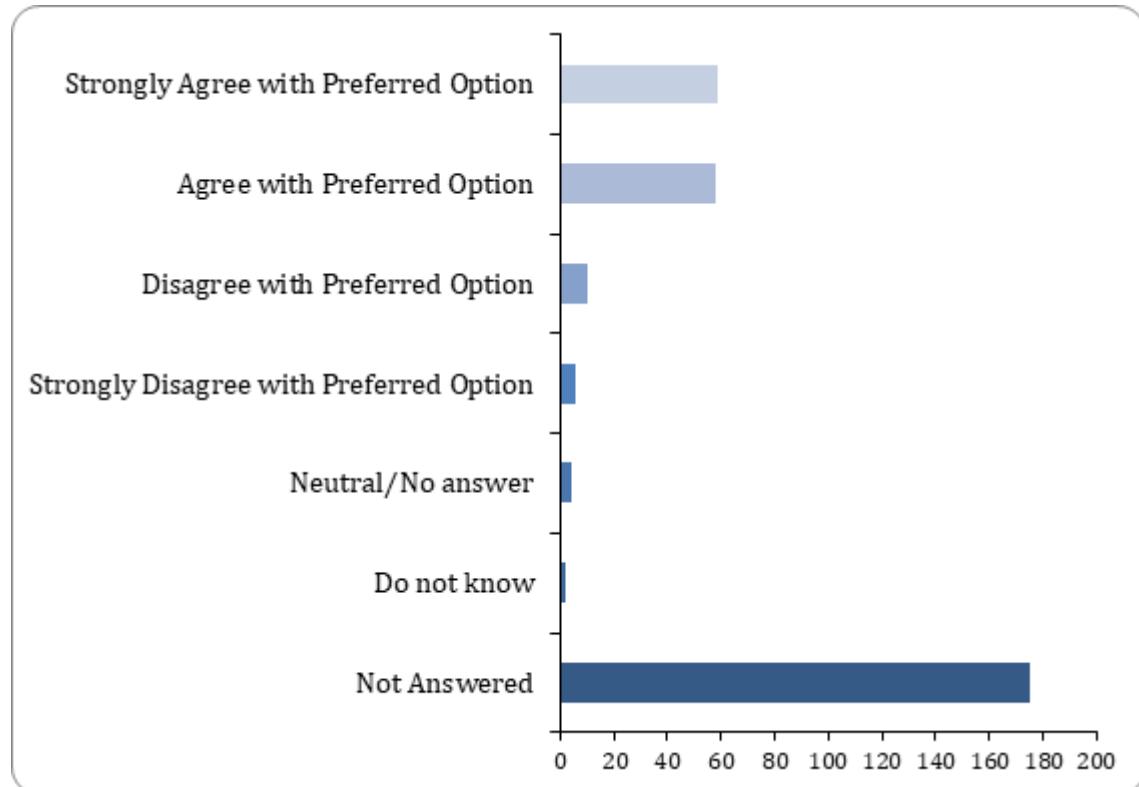
Statutory Consultee Responses – Draft Policy HD12

No statutory consultee comments on draft policy HD12.

All Public Responses - Draft Policy HD13

Please tell us what you think about policy options set 010d (draft policy HD13): Outdoor Amenity Space. If you have any additional comments please put them in the comment box.

There were 139 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 59 | 18.79% |
| Agree with Preferred Option | 58 | 18.47% |
| Disagree with Preferred Option | 10 | 3.18% |
| Strongly Disagree with Preferred Option | 6 | 1.91% |
| Neutral/No answer | 4 | 1.27% |
| Do not know | 2 | 0.64% |
| Not Answered | 175 | 55.73% |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--|---|---|
| HD13 | Support for policy | Support especially where high density and built up areas like Oxford | The support is welcomed. |
| HD13 | Support with suggested amendment | CPRE support this policy and seek that communal food growing space is specifically encouraged within this policy. | Criterion f) states: “for communal spaces that there is a variety of space, including provision of space to sit and to play, and that space is adaptable to the changing needs of residents, being easy to maintain with resilient materials, but with opportunities for communal gardening or food growing.” |
| HD13 | Clarity over how the policy relates to student accommodation | The policy appears to apply for purpose-built student accommodation, but it does not offer detailed clarity of what ratio is expected, and what other factors (elements d-i) might be applied to the policy specific to student accommodation. | The Policy (HD10 in the Submission Draft Plan) does not apply to student accommodation. |
| HD13 | General comment | This draft policy requires minimum levels of outdoor amenity space provision. This includes 1 and 2 bedroom apartments which are expected to provide either a private balcony or terrace or have direct and convenient access to a private or shared outdoor space. | Noted comment. |
| HD13 | Require policy for non-resi | Set a requirement for outdoor amenity space for larger non-resi development | There are requirements for greening, but public spaces won't always be practical or compatible with non-resi developments. |
| HD13 | Concerns about policy long-term | Having little individual bits of gardens means that the quality of space is inevitably really limited and there should be a greater push for shared spaces | This level of detail is dependent on the design and vision for the development. |
| HD13 | Concerns about balconies | Don't think balconies should be counted towards space – they're too cramped | Balconies have the advantage of providing direct access to private |

| Draft policy | Topic | Summary of comments | Response |
|--------------|----------------|---|--|
| | | | outside space, even in tall blocks of flats. |
| HD13 | Against policy | Believes the need for housing is greater than amenity space | Requiring amenity space should not compromise developments coming forward, but will ensure they are decent places to live. |

Statutory Consultee Responses – Draft Policy HD13

Oxfordshire County Council

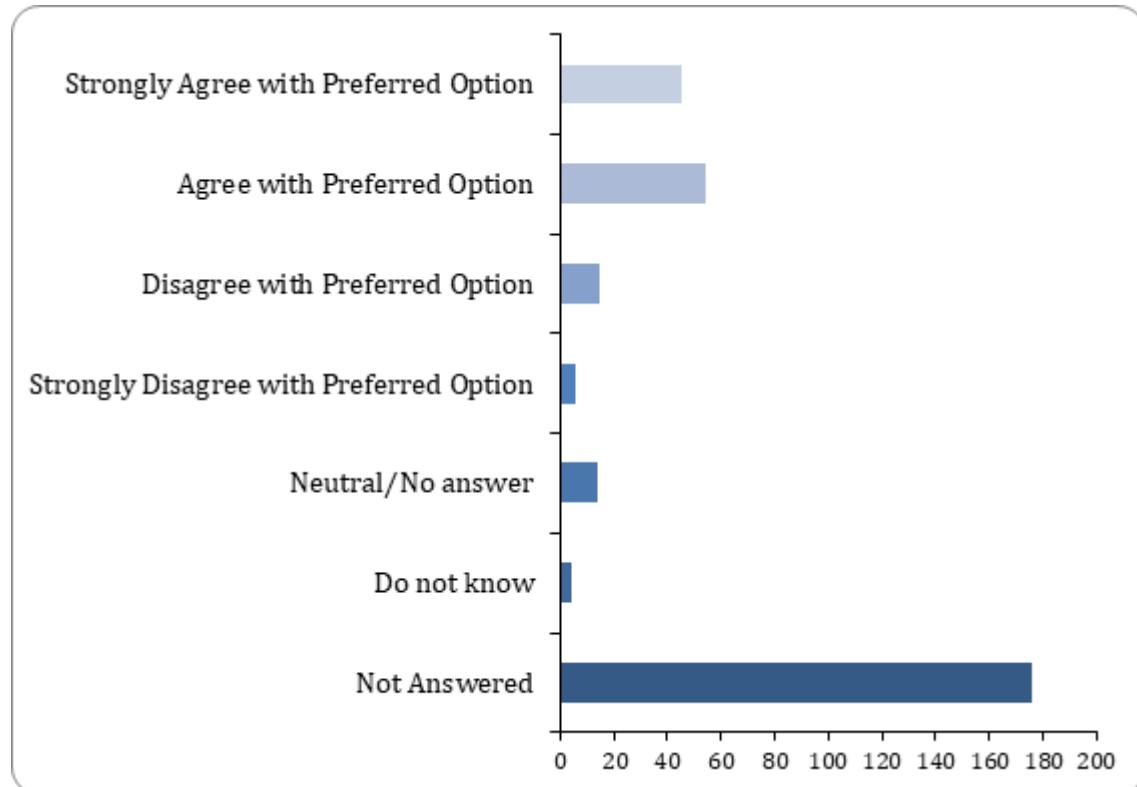
| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|--------------|---|---|--------------------|
| Policy HD13 | <p>Public Health</p> <p>This policy wording currently only includes drying space for houses, flats and maisonettes of three or more bedrooms. It needs to make it explicit that even in cases where smaller properties (e.g. one/ two-bedroom flats) are unable to have private outdoor space for clothes drying, that adequate communal drying space will be provided.</p> <p>The Gov.uk website has provided some guidance on how to reduce potential indoor air quality issues through the provision of drying space:</p> | We consider that the policy as drafted is sufficient and supports a proportionate amount of outdoor space based on proposed property sizes. | No Action Required |

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|---------------------|--|-------------------------|----------------|
| | Understanding and addressing the health risks of damp and mould in the home - GOV.UK | | |

All Public Responses - Draft Policy HD14

Please tell us what you think about policy options set 010e (draft policy HD14): Accessible and Adaptable Homes. If you have additional comments please put them in the comment box.

There were 138 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 45 | 14.33% |
| Agree with Preferred Option | 54 | 17.20% |
| Disagree with Preferred Option | 15 | 4.78% |
| Strongly Disagree with Preferred Option | 6 | 1.91% |
| Neutral/No answer | 14 | 4.46% |
| Do not know | 4 | 1.27% |
| Not Answered | 176 | 56.05% |

| Draft policy | Topic | Summary of comments | Response |
|--------------|---|---|---|
| HD14 | M4(3) does not remove need for specific older persons' housing. | <p>It is common for Local Authorities to conflate the needs of wheelchair users with the needs of older people in the community. Although adaptable and accessible housing can assist it does not remove the need for specific older persons' housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing.</p> | <p>Policy HD14 (HD11 in the Submission Draft Plan) works together with other policies, including Policy H12, which sets criteria for older persons accommodation</p> |
| HD14 | Should go further | <p>Those requiring accessibility arrangements shouldn't be restricted to affordable housing. We also recommend that 10% of new homes are built to the M4(3) standard across all tenures to meet current and future disability needs.</p> <p>Where exceptions are allowed, accessible accommodation must be provided on the ground floor.</p> <p>All multistorey buildings should be accessible by lift, especially if social housing. It's discriminatory to restrict those with a physical disability to live on the ground floor.</p> <p>The standards are essential to ensure inclusive, future-proof homes that support aging in place. Therefore 100% should be M4(2) and 10% M4(3), recognising the critical shortage currently. This supports inclusive communities but also reduces long-term costs that may otherwise fall to the local authority- e.g. stairlift installation about £6,000 cheaper.</p> <p>The local plan could also help address disabled people's housing needs by requiring planning teams to track the number of homes given planning permission to one or other of the higher level accessibility standards. This will help to establish and track delivery which in turn will assist future strategic planning.</p> | <p>The Planning Practice Guidance¹ is clear that local plan policies for wheelchair user homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.</p> <p>The PPG is also clear that requirements are based on local need.</p> <p>The exceptions criteria do require that option to use the ground floor is fully explored.</p> |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|--------------------|--|--|
| HD14 | Do not have policy | Rely on NPPF | The NPPF does not set any specific requirements/thresholds for Oxford. |
| HD14 | Viability | <p>As per comments already made in respect of viability, it is currently unclear if the M4(3) standard requirements are viable for older persons housing and we recommend that the council update the study and provide clarification on the testing undertaken for sheltered and extra care housing.</p> <p>Lifts, wider corridors, reinforced bathrooms- adds £8-10k per flat and potentially reduces number of units. Price out the households the policy aims to help.</p> | The policy approach has been considered in the whole-plan viability testing. |

Statutory Consultee Responses – Draft Policy HD14

Oxfordshire County Council

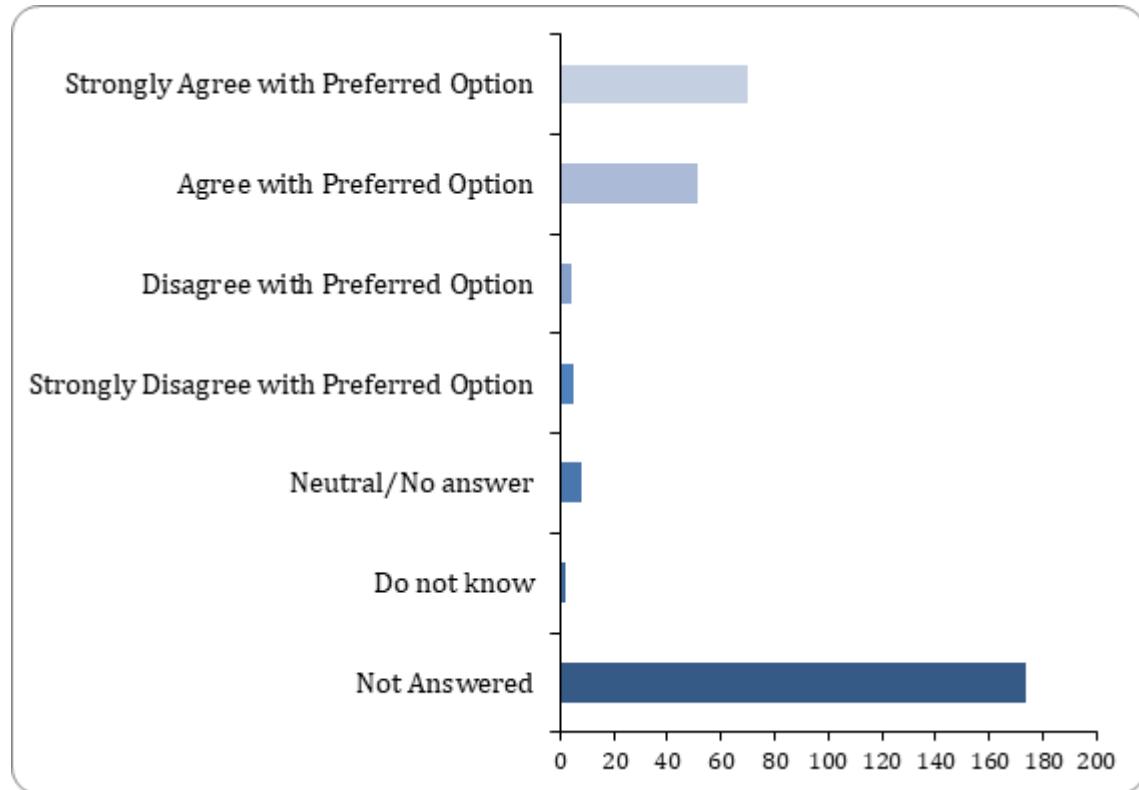
| Draft Policy | Summary | Response | Outcome |
|--------------------------------|---|---|--|
| Policy HD14 | Housing Services / Public Health | | |
| Accessible and Adaptable homes | <p>We appreciate the recognition in the supporting text to Policy HD14 that homes need to be built with the flexibility to be adapted to the changing needs of residents. The policy requirements include 100% of affordable dwellings and 15% of market dwellings on major sites being constructed to the Category 2 standard as set out in the Building Regulations Approved Document M4. There are some further requirements to a higher level in the policy, as well as exceptions identified. The City</p> | <p>Noted. We will consider suitable wording to ensure the continued application of the policy should changes in Building Regulations arise.</p> | <p>Oxford City Action: Ensure wording is future-proofed for changes in legislation</p> |

| Draft Policy | Summary | Response | Outcome |
|--------------|---|--|---|
| | <p>Council needs to be confident that even if the Building Regulations change, that the requirements of the policy will still apply.</p> <p>The County Council wants to see 'lifetime homes' built to the maximum extent possible so that people do not need to enter the care sector prematurely.</p> <p>The County Council does not wish to see more care homes built in Oxford City.</p> | <p>Noted.</p> <p>In this instance we assume that you are referring to accommodation with 24/7 care rather than extra care housing, i.e., self-contained on-site homes with on-site care available as required.</p> | <p>No Action Required</p> <p>No Action Required</p> |

All Public Responses - Draft Policy HD15

Please tell us what you think about policy options set 011g (draft policy HD15): Bin and Bicycle Stores and External Servicing Features. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



| Option | Total | Percent |
|---|-------|---------|
| Strongly Agree with Preferred Option | 70 | 22.29% |
| Agree with Preferred Option | 51 | 16.24% |
| Disagree with Preferred Option | 4 | 1.27% |
| Strongly Disagree with Preferred Option | 5 | 1.59% |
| Neutral/No answer | 8 | 2.55% |
| Do not know | 2 | 0.64% |
| Not Answered | 174 | 55.41% |

| Draft policy | Topic | Summary of comments | Response |
|---------------------|------------------------------|--|---|
| HD15 | Parking and Bike Parking TAN | TAN 12 (Parking and Bike Parking), dated 2022, is now outdated; Cyclo submitted evidence of best practice in 2024 at the request of Cllr Louise Upton to support its update. Key issues that need addressing include the types of cycle stands, appropriate spacing, and the need to locate cycle parking on the carriageway rather than the pavement. Policy HD15 should cross-reference the cycle parking standards in Appendix 7.4, which itself requires revisions to align with LTN 1/20, as outlined in Policy C7. | Updated policy implementation text to reference Appendix 7.4 and TAN. |
| HD15 | Supportive | Divinity Road Area Residents Association support this policy. | Noted and welcomed. |
| HD15 | Non-interference | Asking Council not to interfere with private property. | Noted |

Statutory Consultee Responses – Draft Policy HD15

Oxfordshire County Council

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|----------------------|--|---|---|
| Policy HD15 | Transport Strategy | | |
| Bin and Bike Storage | There is an opportunity to reference accessibility by exploring solutions to improve the street space and public realm. It is worth noting that the County is working on a Street Design Code which will incorporate a Kerbside | Noted. Once published (and adopted), we can consider inclusion of relevant | No Action Required Oxford City Action: Watching brief for County studies publication |

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|--------------|--|---|---------------------------|
| | <p>Strategy, this will incorporate street design, and we would welcome reference to this. For officers' knowledge it is anticipated this will be approved later this year or early next year.</p> <p>Suggested additional wording for second bullet point on page 148:</p> <p>Servicing features can create a cluttered appearance: <u>impacting movement and accessibility</u> and detract from the design of the development, but they can sometimes be designed as an integrated element of the architecture that can contribute positively to the overall design of the buildings or development <u>and not impinge on movement and accessibility</u>. Detailing of these features can be an important contributor to the character of the area.</p> | <p>references to supporting strategies produced by partner authorities.</p> <p>Suggested changes proposed are to a bullet point relating to policy considerations rather than to the policy itself. No changes proposed to policy text.</p> | <p>No Action Required</p> |

| Policy/Topic | Summary of Comments | Officer Response | Outcome |
|--------------|---|------------------|--------------------|
| | <p>Public Health</p> <p>To maximise modal shift and encourage more people to cycle, cycle storage needs to be located as conveniently as possible. In many cases, this should be at the frontages of homes, or close to building entrances. We echo this statement for charging points for E-cycles.</p> | Noted. | No Action Required |

All Public Responses to the Whole of Chapter 6

| Draft Policy | Topic | Summary of Comments | Response |
|--------------|------------|---|--|
| All policies | Supportive | Cyclox support all policies in this chapter | Noted, support welcomed. |
| All Policies | Objection | All policies in this section confuse method with targets, are ineffective and fluffy, and where not just regurgitate the NPPF so are pointless. | The policies regarding heritage need to clearly comply with the NPPF, but attempts have been made to make them Oxford- |

| Draft Policy | Topic | Summary of Comments | Response |
|---------------------|--------------|---|--|
| | | | specific. Other policies do reflect Oxford's specific needs. |
| HD1-HD9 | Supportive | We strongly support these policies. Like those on green infrastructure, they should be given very strong weight in recognition of the outstanding heritage importance of the city as a whole and the contribution made by individual historic assets including many non-designated historic assets. | Noted, support welcomed. |

