

Chapter 5 – A City that Utilises its Resources with Care, Protects the Air, Water, and Soil

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Headlines for Chapter 5:

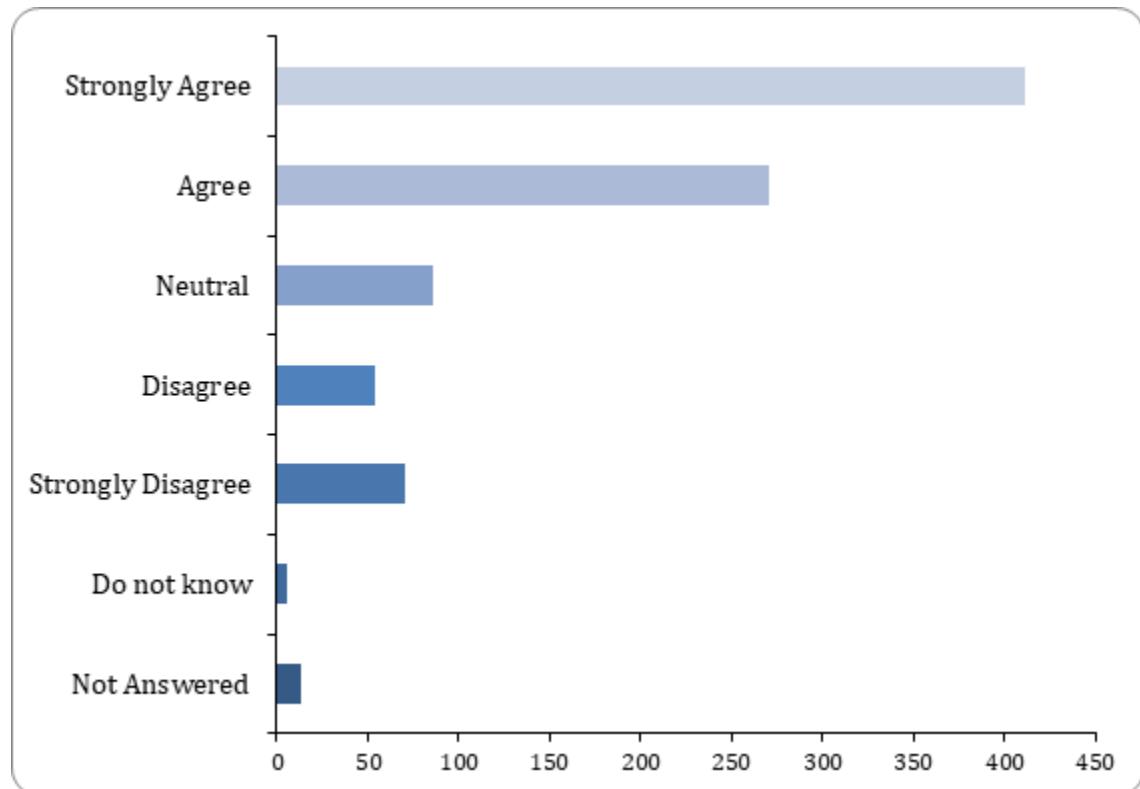
- General support for policies in this chapter
- Recognising the urgent need for these policies, and those in Chapter 4, to promote sustainable development, climate adaptation, energy efficiency and offsetting adverse environmental effects
- Support for carbon neutral development and more effective building design
- Concerns around carbon offsetting
- Further clarification requested over the scope of the policies
- Support for solar panels on housing and businesses
- Water quality and infrastructure should be a priority, and policies should go further

Short Questionnaire Responses

Net zero carbon

We have drafted a policy that requires all new buildings are net zero carbon in operation from adoption of the plan. In a few exceptional cases, payment to offset carbon impacts will be allowed (for example for hospitals, which need to use more energy than it is likely can be generated onsite). To what extent to you agree with this approach?

There were 898 responses to this part of the question.

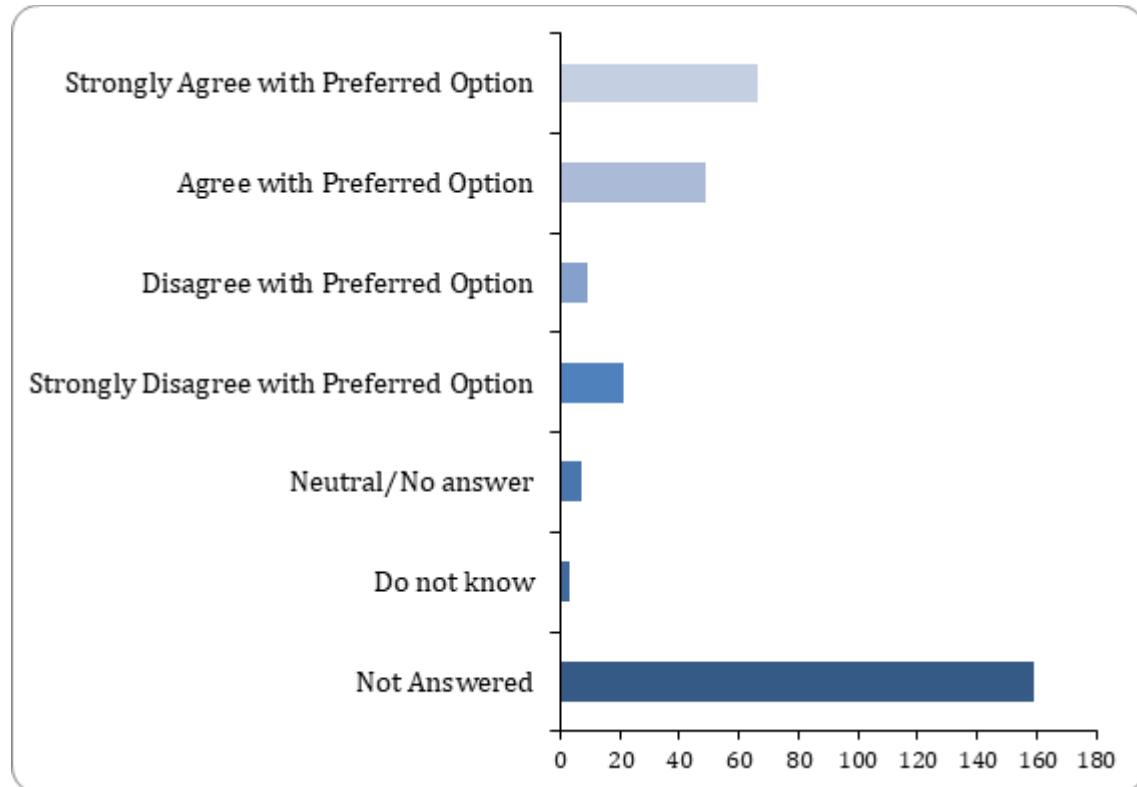


Option	Total	Percent
Strongly Agree	411	45.12%
Agree	271	29.75%
Neutral	86	9.44%
Disagree	54	5.93%
Strongly Disagree	70	7.68%
Do not know	6	0.66%
Not Answered	13	1.43%

All Public Responses – Draft Policy R1

Please tell us what you think about policy options set 008a (draft policy R1): Net zero carbon buildings in operation. If you have any additional comments please put them in the comment box below.

There were 155 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	66	21.02%
Agree with Preferred Option	49	15.61%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	21	6.69%
Neutral/No answer	5	1.63%
Do not know	2	0.65%
Not Answered	158	100.00%

All Public Responses – Draft Policy R1

Draft policy	Topic	Summary of comments	Response
R1	Preferred option	Support for different options in consultation e.g. some flagged support for alternative option 1, whilst others supported option 2.	Noted.
R1	BBOWT	BBOWT strongly agree with preferred option.	Support welcomed.
R1	Support high standards	Support use of the energy efficiency hierarchy. Ambitious targets of measuring energy usage adhere to Passivhaus standards.	Support noted and welcomed.
R1	Welcome wording re: high energy demand non-resi uses	Various comments welcomed the changes to the policy requirements that have been made following previous representations (during Local Plan 2040 preparation), particularly in relation to ensuring that the exceptionally high energy demands of non-residential uses such as R&D/labs/hospitals are acknowledged and that higher EUI targets will be accepted where it is robustly justified.	Noted and support welcomed.
R1	Should incentivise going further	Preferred approach should be minimum, with incentives offered for greener design of buildings.	The policy sets a strong, minimum baseline within the boundaries of what is technically feasible and viable (which we have to ensure to deliver a 'sound' plan through the examination process). We have tried to ensure that climate change is an overarching thread that runs throughout the plan – which emphasise its importance as an issue to be addressed in a variety of ways. Going further than the minimum is of course to be welcomed.

R1	Oxford should lead the way	Oxford should lead the way and is well placed to deliver exemplary design.	Agreed – the strong suite of policies across the chapter as well as elsewhere (e.g. design policies) seek to encourage this.
R1	Policy should go further – all buildings should have solar PV	All new buildings should have solar pv on roof. Easier to install pv during construction than as retrofit. At least require that houses and new buildings have roofs that face the right direction. Buildings should go beyond net zero carbon emissions to optimising renewable energy generation where possible.	Whilst we agree in principle, the policy is technology agnostic in that it does not specify applicants should focus on any one technology. This leaves flexibility to respond to site conditions and also future-proof policy for new technological advances should they emerge. The requirement for matching energy demand through sufficient renewable energy generation seeks to ensure the capacity of micro-renewable energy generation increases in tandem with energy demand. Implicitly this will most often be in the form of rooftop solar pv, but could be via other technologies where this could be more sustainable. Nevertheless, all new development should contribute to renewable energy generation, as would accord with the principle of this comment. Going beyond net zero is of course to be welcomed, we have ensured that the supporting text

			flags this could be possible in some instances.
R1	Should expand to incorporate BREEAM.	Policy R1 and its Energy Use Intensity (EUI) figures could be expanded upon to create some equivalency to BREEAM UK and/or other standardised measurements of development sustainability that are industry-recognised.	Noted – as the Local Plan is proposing high standards across various sustainability policies it was not considered necessary to require applicants to pursue separate certification, however, we will look to reference best practice standards in our supporting Technical Advice Note and applicants are not prevented from pursuing them if they desire.
R1	Oppose any allowance for applicants to avoid targets.	Strongly oppose any policies that enables applications to avoid the targets. If applications cannot meet the targets - even in exceptional cases - they should be refused. Also concerned about how the Council can enforce whether developers comply with the policy. If they do not comply with the meeting the targets - then strict sanctions should be enforced.	The policy sets out requirements that will need to be met for applicable planning applications. The approach to net zero design however is still evolving and there are potential challenges for certain typologies of development. Therefore, the policy sets out clear approaches to follow in circumstances where the criteria cannot be met. This is considered to be the most transparent and pragmatic way to set out how such situations will be dealt with in the face of the known (and unknown) challenges in implementing the

			<p>new policy, whilst also maintaining the strongest position we can on this issue. Applicants would need to submit an energy and carbon statement detailing how they have met these requirements and the permission would be granted subject to a condition that the development is built in accordance with submitted documents. Were an applicant to fail to build in accordance with the condition they could be subject to enforcement action.</p>
R1	Policy goes too far or is wrong priority	<p>Approach is excessive. Net zero is contentious and politically charged. Milder policy needed with focus on adaptation. Oxford has more pressing problems than net zero/carbon reduction. Oxford has negligible impact on climate change. Should fund new technologies if this really is a priority.</p>	<p>National policy is clear that we need to support the transition to net zero by 2050 and take a proactive approach to mitigating and adapting to climate change. The city has a local net zero target of 2040. It is also a legal requirement of the plan-making process which would be tested for as part of examination. Beyond the benefits for reducing impacts on climate change, the policy has other drivers - including air quality (no direct burning of fossil fuels contributing pollutants),</p>

			increasing energy security (more uptake of local generation), and increasing resilience to fuel poverty for occupants.
R1	Policy is wrong priority	Net zero is too expensive. Poverty and erosion of local services should trump eco concerns. Net zero will kill Oxford's economy. Affordable homes should be priority.	The impacts of climate change are unequal and expected to hit the most vulnerable, including those in financial or health deprivation particularly hard because they are less able to absorb or recover from the impacts. As such these concerns are intrinsically linked (it is not one priority instead of another such as affordable housing). See response above for why this policy is important for reasons beyond mitigating climate change impacts. In relation to cost of the policy, its development is informed by viability testing alongside other policies in the Local Plan.
R1	If not net zero right now, should push for net zero ready.	As well as off-setting, should require that buildings that cannot be fully carbon zero right now, be designed in such a way to facilitate becoming carbon zero at a future date e.g. capacity to install a heat pump or other.	Agreed. The energy offsetting requirement does not replace the need for meeting the other criteria of the policy – including no fossil fuels – which would ensure it is net zero ready.
R1	Requirements are too onerous	Concerned that these requirements would be too onerous and discourage new development.	This could be in relation to a couple of factors. Too onerous to

			<p>achieve technically or in terms of ensuring a development is financially viable.</p> <p>On the first issue, the literature review included in the evidence base sets out the range of evidence from across the country that net zero in operation is technically feasible on many types of development. Where there could be challenges, we have included mechanisms in the policy – e.g. allowance for offsetting.</p> <p>On financial viability, the whole plan viability report details the testing of the policy alongside other requirements in the Local Plan which has informed the policy approach.</p>
R1	Agree no fossil fuel should be allowed	Comments agreeing we should permit no fossil fuel use in new buildings.	Noted, welcome the support.
R1	Fossil fuels should be available as an alternative	Fossil fuels should be available as an alternative in case of power outages.	Noted. The policy aligns with local and national objectives.
R1	Wood-burning stoves	Would net zero houses ban open fires or wood-burning stoves? Another comment that wood-burning needs to be addressed through advertising and public education.	The policy sets the requirement for net zero development – it does not prescribe specific methods of heating which should be used to achieve this. Separate policy on air quality would also

			apply and any application proposing wood burning would need to comply with that as well as other local requirements – e.g. the city's smoke control zone which was expanded in 2024.
R1	Onsite renewable energy preference to meet energy balance	Concern that the high energy needs of some types of development (e.g. labs, life science buildings), mean it is wholly unrealistic for all energy needs to be met through onsite renewables. Non-residential uses will inevitably be required to pay an 'energy offsetting' fee.	Noted, however, meeting energy demand through energy that is generated renewably is a key component in net zero carbon design. The policy is as flexible as possible about how this is achieved. It does not require energy demand to be met through renewables onsite only, other options are allowing applicants to utilise offsite locations elsewhere in the city, or paying into the offset fund.
R1	Onsite renewable energy preference to meet energy balance	Requirement that all energy needs are to be met on-site through renewables before looking to offsite options is inefficient (e.g. requires designing for peak demand and would often lead to a lot of excess energy being sent to an already congested grid) and could mean the energy is simply wasted. Approach is also costly and will affect financial viability.	Matching energy demand with renewables, ideally onsite, is a key element of net zero carbon buildings in operation. The policy does allow for offsite solutions where matching energy demand through renewables onsite is not fully feasible.
R1	Onsite renewable energy preference to meet energy balance	Restrictions on sites with valuable heritage may not be appropriate for on site generation, further restricting the options available to the applicant.	The policy does not require all renewable energy demand to be met onsite, this is just the preference to reduce need for

		<p>Another comment flagged the concern that the requirement to achieve energy generation to match needs on site is in conflict with other policies of the plan (such as Policy HD8, which seek to ensure best and efficient use of land).</p>	<p>offsite solutions. Where insurmountable heritage constraints did apply, this could be a reason for looking to offsite (or offsetting) to meet some of the energy demand. Policy HD8 is clear that net zero carbon design is one of the considerations that should inform built form/efficient use of land.</p>
R1	More area-wide approach needed	<p>Policy should be revised to support a more effective, area-wide approach - such as Local Area Energy Plans - and express interest in working with local authorities to develop this strategy.</p>	<p>Comment noted – the policy is focussed on design at the scale of new buildings, this does not mean that the Council is unsupportive of broader area-wide approaches.</p>
R1	EFW incinerator energy	<p>Assume that energy use which is to be met through equal amounts of new renewable energy generation (ideally onsite) does not include the use of EFW incinerator energy? This is the dirtiest method of providing heating etc</p>	<p>The policy is not explicit about any particular technology that should be used to meet the requirements of the policy. The preference is that applicants will utilise the most effective and sustainable technologies for their particular site to meet the requirements. It is considered unlikely that an EFW solution would be put forward to meet energy needs of a specific development, but where that were the case, it would need to conform with all the policies in the</p>

			Local Plan including those on air quality and amenity.
R1	More detail needed in relation to energy offsetting approach	<p>Various comments wanting more detail on how the energy offset mechanism will be applied, including in relation to:</p> <ul style="list-style-type: none"> - More transparency on what the charge will be and how it is calculated, as supported by evidence. - How the Council will use these contributions, as no fund, or schemes have been established to ensure that the contributions will deliver appropriate offsetting. 	<p>It is envisaged that the offsetting fee will be published on the website and updated when necessary (e.g. to reflect inflation). This will give applicants clarity on pricing in advance. The draft process for calculating the offsetting contribution will be set out in draft in the Reg 19 background paper and would ultimately be published as part of a Technical Advice Note. The way the fund will be managed and the fees utilised for projects will be further developed as the Local Plan progresses towards adoption, though this is a separate workstream to the Local Plan's development itself. We agree that it is important that the funds are utilised as effectively and transparently as possible, and to fund projects which deliver true offsetting within the city.</p>
R1	Offsetting charge impact on viability	Concern offsetting charges lead to uncertainty around the financial cost on development. This is a further financial burden on commercial development which further calls into question the viability of such developments.	See response above which sets out how we will convey the price and process for determining offset fee in advance to applicants.

			Policy S4 details how viability concerns arising from offsetting will be addressed and includes a mechanism by which these can be reduced incrementally if needed, though the development will still need to meet the other requirements of R1.
R1	Audit trail for offsetting fund.	Council will need to ensure that it has a suitable audit trail for payments made and projects delivered and the amount of carbon offset.	Noted and agreed – this will be considered further as the process for managing the offset fund is further developed, which is a separate consideration to the Local Plan development.
R1	Oppose offsetting	Requirement that compensatory renewable energy capacity be on-site is a silly gimmick and should certainly not be law.	Offsetting is an option that can be used as a last resort, the preference is for applicants to meet the policy requirements in full through onsite solutions.
R1	Offsetting as last resort	Offsetting should be used only in extreme.	Agreed, the draft policy set out that it should only be considered as a last resort.
R1	Offset mechanism is a get out clause. If needed, should be spent appropriately.	Oppose the offset allowance – this is a get out clause for developers. If needed, offset fund should be directly used/ring-fenced by the City Council for the retrofitting of community buildings for community energy hubs, such as local schools, nurseries, village halls and community centres. Particularly targeting areas of highest fuel poverty.	Offsetting (as a last resort) is the most pragmatic way to address the challenges that some types of development will face in the context of existing technological constraints. Funds can help to deliver retro-fit to existing buildings which currently contribute to emissions. The

			process for spending funds and identifying suitable projects is subject to further work alongside the Local Plan. It is important that the funds are used to deliver true offsetting that would not happen otherwise and be in line with the objectives of the policy. We agree that, where possible, it would be valuable for these projects to also secure wider public benefits such as delivering retrofit to community buildings and those in greatest need, although the explicit criteria will need to be considered further.
R1	Have alternative forms of energy use rating been considered?	Despite different EUI targets for high energy use developments, concern that these and space heating demand targets are not useful for a number of building types which can make implementation more challenging. The use of the Display Energy Certificates (DEC) could be considered as this methodology allows for various building types within its methodology.	Using Energy Use Intensity as the key performance metric provides for a standardised approach to measuring performance across all buildings. All buildings should be able to calculate performance using EUI (overall energy use, divided by gross internal floor area). The specific EUI targets they can feasibly achieve may differ between typologies (hence different targets for resi/non-resi/high energy uses in the policy). It is also the performance

			metric recommended by a growing body of industry.
R1	Support in principle	Where applicants have limited land control, delivering renewables offsite is not likely to be achievable and, where the City already recognises a significant shortfall in land available to meet the City's need for housing, it is questioned how reasonable an approach this is.	The policy also allows applicants to pay into an energy offsetting fund where they are unable to deliver renewables onsite or on land elsewhere in their control.
R1	Objection (focus on viability)	<p>Unclear how requirements have been tested in respect of sheltered and extra care housing proposals.</p> <p>Of the viability testing undertaken in respect of older person's housing in the 2023 study, there are multiple scenarios where even in the highest value bands and lowest benchmark land value scenarios, 0% affordable housing is viable and indeed, some of the land values generated are negative. This implies that there will be situations where the various sustainability enhancements are unviable for this typology.</p> <p>Recommend that viability evidence is updated to reflect comments before any enhancement costs such as proposed here may be considered viable.</p>	The policy's development is being informed by whole plan viability testing. Comments from this consultation will be taken onboard where applicable.
R1	Concerns over viability and deliverability	<p>The requirements of the policy may harm the viability of large schemes because of other requirement burdens. Meeting both regulated and unregulated energy targets entirely through onsite renewable energy is unlikely to be deliverable.</p> <p>The requirements add a costly compliance layer that the Plan itself admits will be "more challenging" and may require offset payments for high-energy research labs and hospitals. Viability impacts will push applicants to cascade and end up trimming off other public benefits like affordable housing.</p>	<p>The policy's development is being informed by whole plan viability testing.</p> <p>As set out above, where applicants are unable to provide enough onsite renewable energy generation to meet energy demand, the policy allows for other options (e.g. offsetting).</p> <p>The viability cascade as set out in policy S4 sets out a clear strategy for how contributions should be</p>

			reduced, beginning with energy offsetting (development will still need to meet other requirements of R1), before looking to other topics like affordable housing.
R1	Policy exceeds national requirements	<p>Concern that the Council is pushing for energy efficiency standards of new homes that go beyond the Future Homes Standard (FHS). Also concern that Council is going against Written Ministerial Statement of 2023.</p> <p>It was flagged that requiring net zero in line with building regulations has various advantages including requiring the same approach that all developers can understand and which can be rolled out at scale. Any jump in standards also necessitate phased transitional arrangements to enable market to adapt.</p> <p>Some comments were that the Council should stick to national standards (and set no local standards) in light of this. If going beyond current or future standards it must be done in a way that is consistent with national policy and Council should fully assess consequences (e.g. viability and feasibility).</p>	Relying on national standards alone, even with the uplift that will be brought in through the Future Homes and Buildings Standard would not deliver truly net zero buildings in operation. The local policy is important for supporting the local net zero target of 2040; reducing the number of buildings that will require retro-fit in future; as well as reducing exposure of future occupants to risks of fuel poverty. The approach proposed is consistent with net zero carbon policies that are increasingly being adopted across the country and as is recommended by various national bodies.
R1	Alternative standards should be used – more aligned to Future homes standard	A pragmatic route would be requiring net-zero-ready fabric (national Part L uplift, no new gas) and let developers meet unregulated loads through market-led efficiency gains and grid-scale decarbonisation—as the Future Homes Standard is designed to do—while still encouraging onsite renewables where they are technically and economically rational.	Noted, see response above.

R1	Policy forces householders to seek alternative ways of heating extensions to main house.	The policy is not justified and is ineffective. Forcing householders (condition 4) to heat their existing homes with gas, but then with an entirely new method (non-gas) for a new extension. An acceptable solution should be to achieve a net improvement, e.g. a householder can insulate the rest of the house at the same time as the extension construction.	The draft policy set out that extensions are expected to comply with criteria 1-3, unless they would result in the creation of a self-contained dwelling or non-residential unit, in which case all criteria apply. As such the requirement for no fossil fuel in the extension is only engaged in the latter case (where the extension would result in self-contained dwelling). We will look to whether there is a way to make this clearer in the Reg 19 draft.
R1	Policy is overly prescriptive, lacks flexibility	Draft Policy R1 is overly prescriptive, lacks flexibility, and lacks a tested, evidence-based exemption process which risks deterring investment key employment sectors. Example given relates to proposed 20 kWh/m ² /yr cap on space heating and the blanket ban on fossil fuels - Lab buildings often have unavoidable high energy use due to mechanical ventilation, pressurisation systems, and internal environmental controls.	The policy sets key energy performance standards but allows for flexibility in how these are achieved – e.g. not being prescriptive about technologies. There are also mechanisms in the policy which set out what applicants should do if any requirement can be shown to be not feasible.
R1	Policy is not supported by evidence	Policy is not underpinned by sufficient evidence.	The policy draws on a range of evidence that supports the technical feasibility of delivering net zero (and the situations where it is more of a challenge) that has been produced across

			the country from a variety of comparable local authority areas. This is summarised in the Literature Review. The policy is also supported by the range of analysis set out in the net zero carbon background paper.
R1	Policy creates substantial uncertainty for complex science and innovation facilities	Policy creates substantial uncertainty for complex science and innovation facilities. Requiring 100% on-site energy generation is unrealistic for R&D campuses (due to have high energy loads and limited roof or land space for renewables).	As covered earlier, where onsite renewable energy generation to meet energy demand is not achievable, there are other options allowed for in the policy.
R1	Policy could have various negative impacts for design and expense.	Requirements could distort site design, waste land, or necessitate expensive, inefficient infrastructure.	We have set the policy to be as flexible as policy to enable variations in site context and needs of different proposals whilst still requiring key performance standards to demonstrate net zero in operation.
R1	National policy does not support need for full self-sufficiency.	National policy supports low-carbon design and energy hierarchy principles, not full self-sufficiency.	The city has a local net zero target of 2040 and the national requirement is 2050. The policy sets requirements which will help to ensure that new development that will exist beyond both of these dates would not require extensive retro-fit in future. It will also help to address other challenges like air pollution, energy security and fuel poverty.

R1	Lack of published viability testing	Viability of these requirements have not been tested through a published viability assessment. When coupled with other policies, it risks pushing R&D schemes beyond deliverable limits.	The whole plan viability testing will be published at the next stage of consultation. The development of the policy is informed by viability testing alongside other policies in the Local Plan.
R1	Policy should do more regarding heat networks	<p>Policy is limited in what it says about heat networks. Words like ‘consider’ are too easy to ignore. Central government policy (DESNZ) is strongly towards the delivery of heat networks in urban areas and Local Plan should be a catalyst. It is suspected that connected to a heat network will be cheaper than other solutions. It is recommended that the Policy be strengthened by mandating connection or, failing that, mandating a business case to be undertaken with an existing HN operator to demonstrate that a connection is not viable.</p> <p>Wording should state that it is an <i>“expectation”</i> or <i>“requirement”</i> to connect where networks are available and have capacity. Also, limited acknowledgement or support given to assist overcoming challenges to the development of heat networks in Oxford i.e., extensive heritage assets and rivers</p>	<p>The policy sets out a framework of performance standards for ensuring new buildings are net zero in operation. There can be a variety of technological solutions that would enable the various criteria to be met. The Local Plan continues the approach of the adopted Local Plan in not explicitly favouring any one technology – so as to allow the most sustainable solution to come forward for each site, depending on its context. This also allows for future-proofing of the policy where new or improved technological solutions become available. We are aware that heat networks can be seen as playing an important role in certain contexts and have explicitly flagged this as a consideration in the policy – however, we would maintain that</p>

			flexibility should be retained for applicants to pursue the most sustainable option for the proposed development. We would be open to exploring how further support for applicants pursuing heat network connection could be expanded upon in supporting guidance for the policy such as the intended Technical Advice Note that is envisaged.
R1	Connecting to existing energy networks as an alternative to onsite generation.	Alongside on-site generation of renewable energy, policy should give equal weight to connections to existing renewable / LZC energy technologies (e.g., district heat networks) to fulfil heating requirements of developments. As currently worded, could discourage developers from connecting existing networks. Additional wording suggested to add to the energy hierarchy requirement – allowing connection to offsite heat source alongside onsite renewables.	As set out above, we acknowledge that there can be a variety of technological solutions that would enable the various criteria to be met – this could include connection into a heat network where available. We disagree that the wording would discourage applicants from pursuing this option where it is the most fitting solution for their site and for meeting the policy requirements.

R1	More clarity needed on types of applications policy applies/does not apply to	Policy sets out requirements for additional deliverables/ supporting energy-related information for all new development but does not distinguish between different types of development (and their nuances). E.g. Policy sets out that the Council would expect this information to support planning applications for renewable / LZC developments, (despite it being irrelevant to such developments). Should seek to introduce policy wording/ supporting text to confirm that this would not apply to renewable / net zero carbon technology development (such as energy centres/ infrastructure associated with district heat networks and other renewable energy development).	The starting point of the policy is that all new buildings should be net zero carbon in operation. It is acknowledged that various types of development will have their own nuances and requirements. The policy sets out what is expected of proposals where compliance with the requirements is not possible and allows for applicants to justify this.
R1	Policy should address need for Energy Centres.	<p>Neither the Policy nor the Local Plan makes reference to energy centres which are fundamental to developing heat networks. The plan does not allocate any sites for energy centres and is unsupportive and restrictive planning policy context for any planning applications. Applicants would need to overcome any policy designations / allocations on otherwise suitable sites to make development permissible. Energy centres are key to net zero carbon goals and can bring wider positive benefits e.g. jobs, public health.</p> <p>Additional wording suggested including that low carbon energy centres be supported alongside development of heat networks; that Council will work proactively with developers to overcome constraints like heritage, infrastructure and crossing water; that Council will expect developers to connect to a network where it has sufficient heat/capacity; and that where applicants propose not to connect they provide robust justification.</p>	<p>We agree it would be helpful to also flag support of energy centres alongside general heat network development and will amend the policy as such.</p> <p>However, an allocation in the Local Plan is not considered necessary to allow the development of an energy centre to come forward in a suitable location in the city. An allocation would also not negate any additional policy considerations in the Local Plan that development would need to comply with where these are of relevance to developing in a certain location.</p>

			See previous responses which address other elements of these comments.
R1	<u>Suggested Energy Centre Site Allocations</u>	<p>Whilst aware of the development constraints within the Oxford, have identified two suitable sites for an energy centre that would minimise impacts on heritage / Green Belt / other environmental considerations. Propose that Council removes/ reduces GI protection and allocates for energy centre:</p> <ul style="list-style-type: none"> Former Hinksey Campsite – part of core GI network but considered to have limited scale/ quality of GI on site and not of significant ecological value. Site is no longer in use as a campsite and no longer confers social benefit. Park Farm - currently allocated for residential development thus principle of development is accepted. Allocation now being removed indicates site is not needed for housing. Site is not publicly accessible, limited in green features and has minimal opportunity for biodiversity – thus unclear why it has supporting status in the Green Infrastructure. <p>Securing site allocations to allow energy centres to come forward will enable the benefits of the proposed network to be realised. A future network would ultimately require multiple energy centres to power the network in future phases, thus both are needed as allocations.</p>	<p>As set out above, a specific allocation in the Local Plan is not considered necessary to allow the development of an energy centre to come forward in a suitable location in the city.</p> <p>The Local Plan has sought to identify sites for designation within the Green Infrastructure Network (as either core or supporting spaces) where they meet particular criteria regardless of location. Where a site may be identified as beneficial for another use, this would not negate the considerations regarding its identified green infrastructure value.</p>
R1	More guidance/support needed for sports facilities	Sport England is concerned that new or upgraded community facilities may not be delivered, or old community buildings may be retained that cannot meet current standards for accessibility. Sports facilities will face different challenges to other sectors when seeking to make their facilities more sustainable. Important that the Plan considers including policies that operators of these facilities can	We appreciate that there will be various nuances and challenges for each type of development. The policy includes varying targets for some different types of development as well as

		<p>navigate. Could the Local Plan point to our guidance on delivering sustainable sports facilities and flood prevention?</p>	<p>mechanisms that can be followed where particular site/proposal specific constraints will make certain requirements challenging. There are limits to how far we can diversify the policy to meet every different type of application however. We intend to produce an updated Technical Advice Note which provides additional guidance in meeting the requirements of policy R1 and this could be a place where we can link to more specific guidance for particular types of application.</p>
R1	No mention of community owned energy/local energy hubs	<p>No mention of “community owned energy hubs” or “local energy hubs”- which should be far more common features of any large application. With reference to the success of Low Carbon Hub projects in Oxford City Centre, there could be more emphasis on locally generated and owned energy hubs, as an inherent part of the design.</p>	<p>We will incorporate reference to these within the supporting text of the policy.</p>
R1	No mention of cooling	<p>There are multiple details about heating methods but no mention of air-conditioning or cooling systems. Although we are aware that a/c would increase energy use - the use of cooling systems would be used at a time of increased/excess solar energy (and when there is less need for heating) We are concerned that if city over-heating is not mentioned and the option of a/c and/or planting large trees near buildings (prioritising care homes, hospitals, schools and nurseries) is ignored, then the future of health and wellbeing could be at risk.</p>	<p>Pursuing high fabric efficiency, in line with designing in accordance with the energy hierarchy, should have equal benefits for keeping the building cool in summer as it does warm in winter. However, we agree that addressing overheating will be an increasing issue, and separate policy G9’s resilient design requirements</p>

			specifically set out that applicants need to think about this issue (criteria a and b) – including having a cooling strategy.
R1	Supplementary guidance should be produced.	Supplementary guidance should also be given to developers on how to meet the targets, including changing plans, such as position/direction of solar panels.	Agreed – the design checklist (in appendix) touches on various aspects of net zero design and should support applicant's in approaching their design. Equally, we intend to produce an updated Technical Advice Note which provides additional guidance in meeting the requirements of policy R1.

Statutory Consultee Responses – Draft Policy R1

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R1 Net Zero Buildings in operation	Climate Action We are strongly in favour of the preferred option for this policy, and support the inclusion of regulated and unregulated energy in the net zero carbon mandate. Consideration should	Noted. We will consider setting a separate lower EUI target for schools compared to other non-residential uses.	Oxford City Action: Consider proposed wording going forward.

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	<p>be given to setting a separate, lower EUI target for schools, compared to other non-residential uses.</p> <p>We support the reference to heat networks and the need to consider connections at design stage where relevant.</p> <p>Consideration should be given to the solar orientation of new buildings and developments at design stage to maximise solar capture and ensure thermal comfort.</p> <p>The policy should specify a preference for onsite offsetting of residual emissions through nature-based solutions which also provide other adaptation-related benefits such as shade, cooling, and flood risk management.</p>	<p>Noted.</p> <p>Consideration is given to orientation and solar gain in policy HD11: <i>Privacy, Daylight and sunlight</i>, Policy HD13: <i>Outdoor amenity space</i>. The Design Checklist – Appendix 1.1 also discusses building orientation to maximise solar gain, glazing design to ensure thermal comfort.</p> <p>We can consider whether “on-site offsetting” would work in a constrained city such as Oxford.</p>	<p>No Action Required</p> <p>No Action Required</p> <p>Oxford City Action: Consider proposed wording going forward.</p>

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	<p>This policy should require proposals for redevelopment of a building to improve the energy efficiency of the building and consider retrofit measures which could be undertaken alongside the proposed works. Proposals which significantly improve energy efficiency should be supported.</p>	<p>Policy R1 already sets out that proposals for conversions and changes of use. Policy R3 supports retrofit of existing buildings and expects the energy hierarchy to be followed.</p>	No Action Required

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy R1	<p>Part 2 of draft Policy R1 should be more specific and refer to limiting unregulated energy demands only, whilst still including a regulated total energy cap set by supporting evidence. Regulated energy is easier to limit than unregulated energy in these cases, so providing a regulated energy cap would allow for carbon emissions to be reduced whilst allowing flexibility for applicants.</p> <p>Support the aims but more evidence than the literature review is required, including viability, energy modelling. Part 3 regarding EUI is inaccurate. The wording 'the portion of the development's total EUI associated with space heating is no more than 20kwh/m²/yr should be reworded to ensure it accurately reflects the space heat demand metric.</p>	<p>We concur that the requirement in criterion 3 could be worded more clearly and will amend this for the Reg 19 draft of the policy. Regarding criterion 2, we disagree that the policy should only refer to limiting unregulated energy demands and the EUI target applies to total energy (regulated and unregulated). We envisage that the supporting technical advice note can incorporate additional guidance on how we expect applicants to justify where a higher EUI is</p>	<p>Reg 19 draft R1 wording for criterion 3 will be updated in relation to space heating demand.</p> <p>R1 supporting text will flag the preference for net zero carbon heat sources in heat networks.</p>
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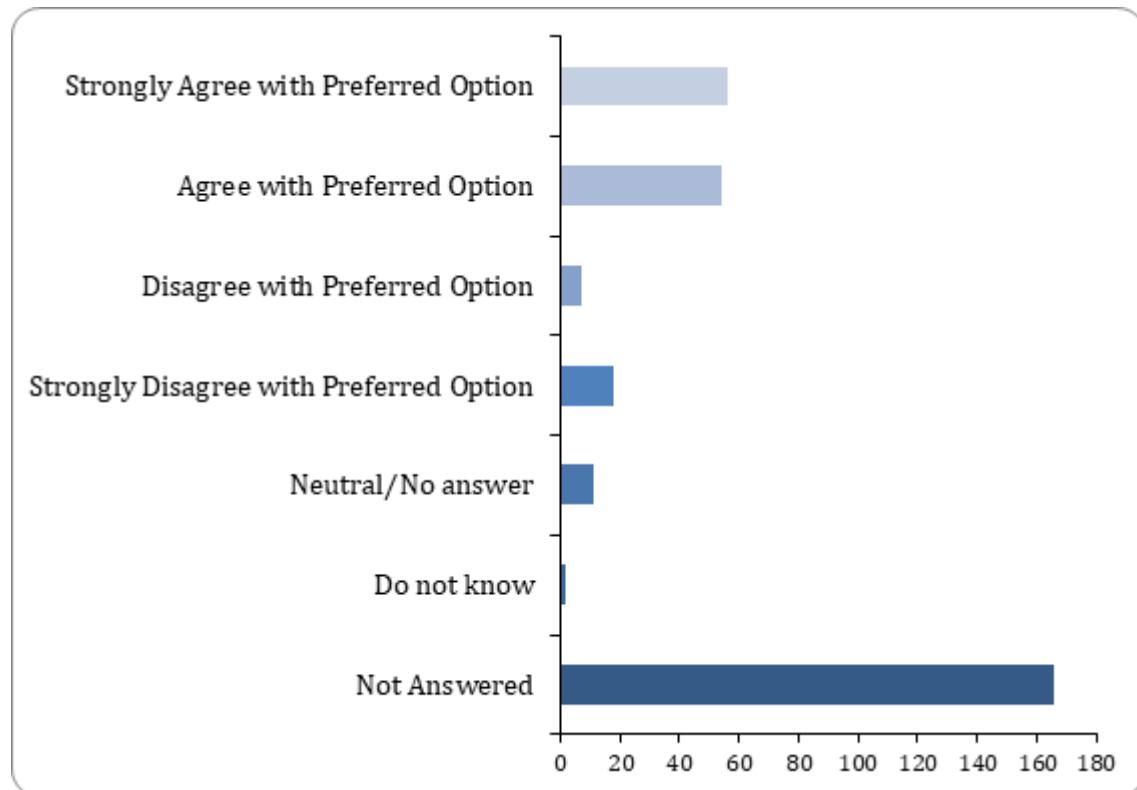
	<p>Space heat demand is the amount of heat needed to keep the building at a comfortable temperature, regardless of how that heat is delivered, whereas EUI reflects the actual energy use at the meter. All industry frameworks recommend using actual space heat demand as the metric. Should change 'EUI associated with space heating' to 'space heat demand'.</p> <p>Recommend undertaking feasibility work to determine EUI requirements by building type, to assess whether they can be more ambitious where technically feasible.</p> <p>We recommend that Policy R1 states that heat networks should be powered from zero emission sources</p>	<p>needed and this could potentially include steps taken to reduce regulated and unregulated loads in turn.</p> <p>We agree that additional evidence is required in relation to viability, and will of course be viability testing the policy alongside the other policies of the Local Plan. However, we disagree in relation to energy modelling. The intention of the literature review was to set out the ever-increasing cumulative evidence base that justifies similar policies emerging/adopted across the country. This focusses on local authority areas whose evidence examines locally applicable building typologies to what could be expected to come forward in Oxford. These all generally show that net zero carbon development is <i>technically feasible</i> for types of development we expect to come forward under the new Local Plan.</p> <p>We agree that heat networks being powered from net zero</p>	
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		<p>sources should be the preference in the first instance and this should be highlighted in supporting text. However, we are unsure whether low carbon sourced networks with a clear pathway to net zero in future should be firmly ruled out, particularly if other sustainability considerations apply.</p>	
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All Public Responses – Draft Policy R2

Please tell us what you think about policy options set 008b (draft policy R2): Embodied Carbon. If you have any additional comments please put them in the comment box.

There were 148 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	56	17.83%
Agree with Preferred Option	54	17.20%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	18	5.73%
Neutral/No answer	11	3.50%
Do not know	2	0.64%
Not Answered	166	52.87%

All Public Responses – Draft Policy R2

R2	Preferred option	Support for different options in consultation e.g. some flagged support for alternative option 1, whilst others supported option 2.	Noted
R2	BBOWT	BBOWT strongly agree with preferred option.	Support welcomed.
R2	Welcome the proposed policy	Various comments flagging support. Comments included that applications that seek to limit embodied carbon should be considered favourably, as well as where a fabric-first approach taken. Other comments included that policy is overdue and would bring in line with RIBA recommendations, or that it would address concerns about embodied carbon impacts of previous buildings in city being knocked down and replaced. Also, that the principle of this policy helps meet Net Zero objectives.	Noted and support is welcomed.
R2	Support principle of asking applicants to consider impacts and take actions.	Supportive of the principle that developments are expected to demonstrate consideration of embodied carbon in the construction process and take actions to limit this as much as possible through careful design choices.	Noted and support is welcomed.
R2	Mixed support and concern	Some comments welcomed the flexibility of the policy not having targets. Others felt that the policy is too rigid. Lacks clarity and that more flexibility is needed particularly for the science and innovation sector. Also some concern about onerous requirements but also support a quantitative approach.	The range of comments reflects the complexity of this topic. See responses below which respond to these issues raised.
R2	Policy should go further – explicit targets needed.	Some felt that the Council should take stronger position on sustainable development including embodied carbon in light of the current climate crisis. Some felt that the policy should include specific requirements for major development measuring embodied carbon during construction through a recognised methodology. Others have specific targets e.g. South Gloucs - 625kgCO2e/m ² for residential of four storeys or less, to 970kgCO2e/m ² for major non-residential schemes	As the consultation set out, the topic of embodied carbon is incredibly complex, and still subject to evolving learning and guidance. The policy is intended as a stepping stone to potentially stronger requirements in future as understanding and approaches

			to reducing it improve. It takes requirements further than the currently adopted Local Plan by seeking to ensure applicants consider the issue of embodied carbon appropriately based on the scale of their development and demonstrate how they have sought to reduce it.
R2	Policy should be removed, current barriers are too extensive.	<p>Aecom, research highlights issues with the lack consistency in reporting on carbon assessment outputs, the quality of carbon assessments, large gaps in the availability of both product specific environmental product declarations (EPDs) and generic data, the variation in product carbon results for similar building products, and lack of consistency across carbon tools.</p> <p>Also highlights issues with the uptake of lower embodied carbon materials and products due to costs, risks and insurance, the need to upskill the industry and access to carbon tools.</p> <p>The challenges have not been addressed yet and are not likely to be addressed in the short term. Without consistent data and information, almost impossible for applicants to provide decision makers with reliable information on which to base a decision.</p> <p>Policy should be deleted.</p>	Whilst understanding is still evolving, the policy is considered to be a flexible and pragmatic response to the need to take actions to limit embodied carbon wherever possible without setting strict targets (for the reasons set out in previous response above). As buildings become net zero in operation, embodied carbon in construction will become the primary source of emissions and this needs to be considered.
R2	National standards will ultimately address embodied carbon – no need for local ones	<p>National standards already moving towards a unified approach (draft Part Z) – setting local standards risks double-regulation and overcomplicates approach with various potential consequences.</p> <p>Oxford should let forthcoming national standards handle the complex, rapidly standardising field of embodied-carbon measurement.</p>	This is not certain – the policy wording includes flexibility to defer to national standards where they arise in future.
R2	No policy needed	No local policy needed – no further reason given.	Comment noted

R2	Demolition is a last resort	<p>Policy should explicitly set out that demolition is a last resort, especially when a building has not exceeded its expected useful life. Another suggestion was for the policy requirement to be more strongly worded: “prioritise the renovation or retrofit of existing structures, as part of an efficient use of resources and minimising carbon emissions”</p>	Comment noted – the policy sets out expectations for applicants to show they have considered whether reuse is feasible.
R2	Variety of concerns with criterion a (explore reuse of buildings before demolition)	<p>Various concerns related to criterion a of the policy and the requirement to explore reuse before resorting to demolition including:</p> <ul style="list-style-type: none"> - That feasibility of retaining existing buildings does not just relate to technical considerations such as structural limitations or operational requirements. - That the requirement ignores longer term sustainability benefits of replacing some buildings (e.g. where they are inefficient) which may outweigh carbon cost that come from demolition and that may derive larger carbon savings in the future, along with wider social and economic benefits - That is unclear how the Council will assess the feasibility of re-use vs demolition. - That this is an open-ended policy test which leaves the final assessment down to the judgement of the decision-maker at the end of the process, reducing certainty for applicants. - That national policy does not strictly prohibit demolition, nor does it suggest that carbon saving policies should be prioritised over the growth of the economy and innovation. - That the requirement stifles potential for innovation. 	<p>The policy is not intended to rule out demolition entirely, or to force applicants to retain all existing buildings. We agree there can indeed be good reasons for replacing existing buildings. The policy simply seeks to introduce a requirement that applicants begin the design process of their site by exploring potential for re-use of existing buildings and robustly demonstrating through their application that this has been determined to be unfeasible before resorting to demolition (explaining why). We have incorporated wording into the supporting text to the policy which expands on criteria a and acknowledges that replacement of buildings can have benefits which override their retention for a variety of reasons.</p>

R2	<p>Support in principle – More focus on whole life carbon testing</p>	<p>Whilst supporting the approach to exploring reuse of buildings in principle, but flagging similar concerns to the above, one comment set out that the Council should place greater emphasis on whole life carbon testing to ensure that operational carbon of existing buildings is factored and that buildings constructed have a longer life span and are capable of flexibility rather than constructing a low embodied carbon building now which is no longer fit for purpose in future years.</p>	<p>Applicants need to set out in their Energy and Carbon Statement how the principles in the policy are embedded in design choices. There may be justifiable reasons why particular design choices need to be made which diverge from some of the principles and this will be for the applicant to explain through their statement. Whole life carbon testing could be one means of justifying a particular design choice, but we have not mandated this as a requirement in showing how the principles have been responded to. We have incorporated some wording into supporting text to help clarify this.</p>
R2	<p>Support in principle – more focus on comprehensive redevelopment approach</p>	<p>Another comment in relation to the approach of criterion a was that the policy should support a comprehensive redevelopment approach where planning and place making benefits outweigh those achievable through the limitations/constraints imposed by reuse of existing buildings.</p> <p>A supporting paragraph should be introduced to go alongside part a) to reference that any such assessment of part a) is proportionate to the assets being reviewed and in the context of other planning policies, such as those which promote transformational change and encourage redevelopment to deliver optimum outcomes. This would ensure that brownfield sites with existing buildings and those allocated for redevelopment in the Local Plan are optimised where a</p>	<p>As per response earlier, we have made sure to incorporate some wording in the supporting text that responds to this point.</p>

		retention approach renders development undeliverable. This would particularly be the case for the Templars Square site.	
R2	Impacts on need for intensifying employment sites should be considered	Oxford is seeking to intensify existing employment sites and there may be an existing building on a site that would not be suitable for the proposed employment use and would not result in making the best and most efficient use of brownfield land. It is therefore proposed that the following wording in bold is added to part a): “Re-use of any existing buildings on a site has been robustly explored and demonstrated to be unfeasible, or where it is not making the most efficient use of brownfield land, before resorting to demolition”	As per response earlier, the wording we have incorporated into the supporting text to the policy expands on criteria a and acknowledges that replacement of buildings can have benefits which override their retention for a variety of reasons.
R2	Policy should be “retrofit/refurbishment-first” not retrofit/refurbishment <i>only</i>	Policy R2 should be a “retrofit/refurbishment-first” policy, not a “retrofit/refurbishment <i>only</i> ” policy. Partially addressed in criteria (a), however the wording highlighting the potential benefits of replacing buildings should be included.	The policy is not intended to be a “retrofit/refurbishment <i>only</i> ” policy. See earlier response.
R2	Concern justification of demolition will be too easy	Support principle that repurposing existing buildings should be default before looking to demolish. Concern that Council will be swayed by expensive reports that too easily justify demolition.	Comment noted.
R2	Additional guidance for the TAN	Suggest including text in future technical advice note on the re-use of existing buildings being dependent on whether they are suited to the requirements of the site.	See earlier response, we have added wording as part of supporting text which addresses this issue.
R2	Some elements of policy should be conditioned, not required up front.	At planning application stage, it is not always possible to define with any certainty the source of materials. This is not known until a contractor is appointed, after planning permission has been granted. As such certain elements of this policy should be conditioned and should not be required up front.	Comment noted
R2	Additional evidence needed to support applications	The policy introduces the need for complex Energy and Carbon Statements including Whole Life Carbon Assessments as well as	The draft Local Plan seeks to ensure that applicants' evidence for demonstrating how the

		quantitative measures for reducing embodied carbon, amongst various other additional reports through the new LP. Government has wider ambition to streamline the planning system and additional requests for information through local policy in support of planning applications should be examined carefully.	requirements of policies R1-R3 are met, is submitted as part of an Energy and Carbon statement. This is to ensure a consistent way of collating this information across applications
R2	Support proposed threshold for Whole Life Carbon Assessments	Support only requiring submission of Whole Life Cycle Carbon Assessments for larger applications (developments of 100 or more dwellings, or 10,000m ² or more non-residential floorspace). This will enable flexibility for future development in the city which will ensure embodied carbon principles are incorporated without adding unduly high burdens on small developments.	Support noted.
R2	Object to requirement for Whole Life Cycle Carbon Assessment.	Embodied-carbon auditing is technically demanding, data-poor, and still evolving. Forcing every major scheme to commission a Whole-Life-Cycle Carbon Assessment and negotiate bespoke reduction measures will lengthen pre-construction phases, raise consultant fees and tilt marginal brownfield projects into non-viability – ultimately impacting pipeline of needed development.	Comment noted, the draft policy requires only the largest scale developments to undertake WLCCA – rather than every major development.
R2	Whole Life Carbon Assessments for all development	Whole Life Carbon Assessment should apply to development at all scales. Given the sustainable development goals within this plan and the national targets it is important to understand the embodied carbon implications of all development.	Comment noted. It is important the policies are proportionate, justified and achievable, which the policy as written is considered to be.
R2	Object to lack of detail regarding Whole Life Cycle Carbon Assessment requirements	Policy requires Whole Life Carbon Assessments (WLCA) for large-scale new-build development but does not specify: <ul style="list-style-type: none"> - The required methodology; - The system boundaries (e.g. whether lab fit-out, site-wide infrastructure or external plant are included); - Baselines or benchmarks by building type or use class; - Measurable reduction targets. 	The policy does not set targets that should be met in terms of overall embodied carbon or how much reduction should be secured through design process for the reasoning as set out in response to earlier comments above. It is for the applicant to

		<p>Lack of detail prevents meaningful engagement during design/planning process & creates risk of subjective/ inconsistent decision-making.</p>	<p>set out how far they have limited embodied carbon in line with the spirit of the policy and within the existing constraints and specific requirements of their particular proposal.</p> <p>In terms of required methodology, including the specifics of what a WLCCA should cover, this would be expanded on in a technical advice note, which can more easily be kept up-to-date to reflect evolving best practice and understanding.</p>
R2	Enforcing requirements of policy	<p>Compliance should be strictly enforced with sanctions for non-compliance. If applications do not adhere to the specific targets set, then applications should be sent further guidelines, and if not followed, should be refused. No point in allowing plans to “demonstrate a robust feasibility survey” and then allowing to exceed carbon targets.</p>	<p>Whilst we appreciate desire for targets, and have responded above on this point, we do not currently see a way to introduce these and assess in a consistent way.</p> <p>Applicants would need to submit an energy and carbon statement detailing how they have met the policy requirements and the permission would be granted subject to a condition that the development is built in accordance with submitted documents. Were an applicant to fail to build in accordance with</p>

			the condition they could be subject to enforcement action.
R2	Objection – policy not clear	This policy is not effective. It is not clear whether it applies to buildings in Conservation Areas (Designated Heritage Assets)	The draft policy clearly sets out that the first part (the principles set out in criteria a-e) applies to all development, and the second part (criteria f and g) applies to large scale new-build development that meets the size thresholds. It would apply to development within conservation areas or outside of them where they meet the above conditions – though of course other policies would also need to be considered (e.g. HD1 Conservation Areas).
R2	Clarification needed	Council should clarify what it means by major development.	The term major development is as defined in the town and Country Planning legislation.
R2	Objection – specialist buildings not considered	Policy doesn't consider specialist nature of lab/ R&D buildings. These buildings often require bespoke, heavily serviced structures that may limit opportunities for material reuse/ application of low-carbon alternatives. Blanket requirement for reuse/ prescriptive performance thresholds risks undermining building safety, functionality, or future adaptability.	Criteria a-e are not rigid in their requirements, they set out particular principles in the design/construction process which need to be considered. Generally, operational requirements of a proposed development will be able to be factored into how they are responded to. E.g. in terms of criteria b – it does not explicitly ask for all materials to be reused,

			or for no waste to be generated – it asks for the Energy and Carbon statement to show that waste has been minimised and reuse of materials maximised, and of course, particular needs of a building's design and construction will influence how far these asks can be demonstrated.
R2	Objection – not viability tested	Concerns about policy increasing cost of development, and that the cumulative burden with other policies has not been tested through Viability assessment. Additional assessment, reporting and material specification costs all add pressure to schemes that already face tight margins due to lab specification, planning obligations, and land values.	The whole plan viability testing will be published at the next stage of consultation. The development of the policy is informed by viability testing alongside other policies in the Local Plan.
R2	TAN should be published before Reg 19 to inform comments	The Council intends to produce a TAN - this must be issued before/at Regulation 19 for informed comment.	Technical Advice Notes are intended to aid applicants and provide additional support/guidance in meeting the policy requirements. It is not necessary for informing comments on the requirements of the policy itself.
R2	General comment	It is possible to carbon cost the Local Plan as it develops and site details develop?	Unfortunately, without being able to predict the finer detail of how each new development brought forward across the plan period would be designed – e.g. specifics of site layout, materials

			used, processes of construction – any quantitative carbon estimate would be subject to significant uncertainties. The Sustainability Appraisal does seek to consider the impacts of the Local Plan against carbon emissions at a very high-level and in a more qualitative way, as it this is one of the 12 SA objectives. The assessment draws out the importance of including policies like R1 and R2 in mitigating carbon impacts as much as possible.
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Statutory Consultee Responses – Draft Policy R2

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R2 Embodied Carbon	Minerals and Waste Policy & Strategy Odd choice to use the phrase 'from cradle to grave' when referencing whole life carbon cycle – in a truly circular economy there should be no 'grave', suggest using 'lifetime of the development' as an alternative phrase.	Noted. We can consider an alternative phrase for the next draft of the plan.	Oxford City Action: Consider proposed wording going forward.

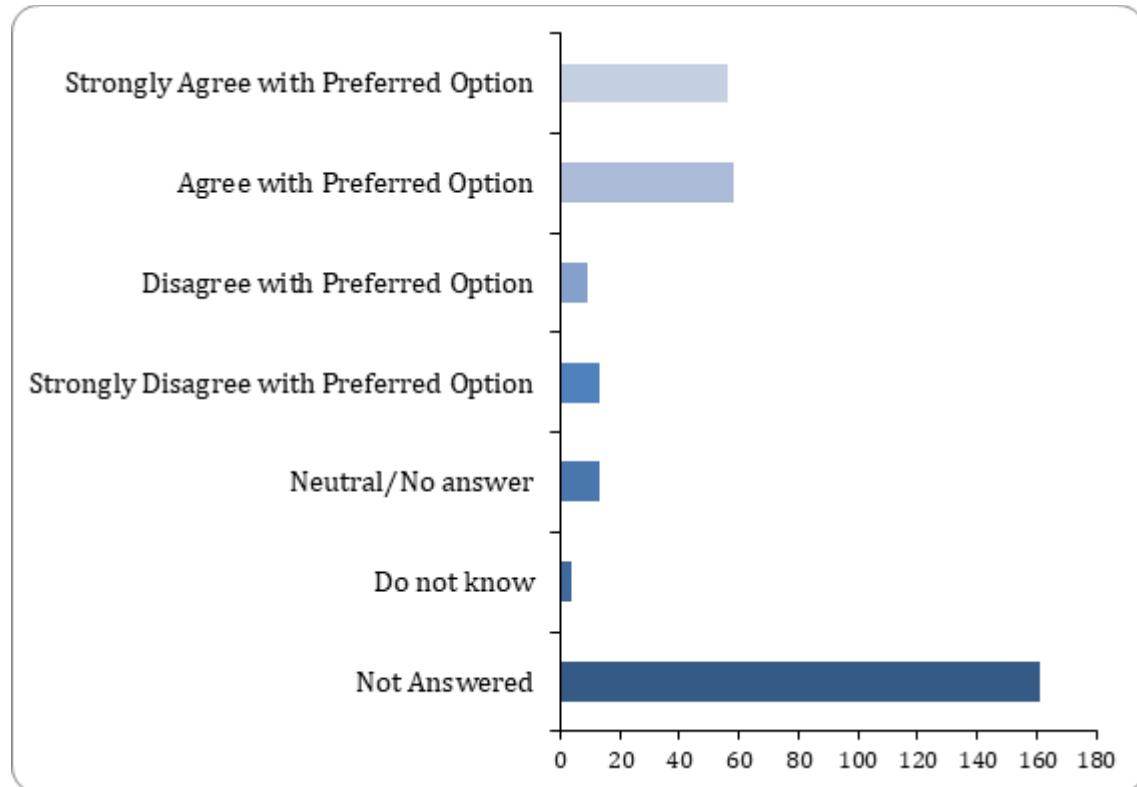
	<p>Welcome point b in Policy R2 – minimisation of waste generation, and re-use and recycling of materials.</p> <p>Climate Action</p> <p>We suggest referring to the use of nationally recognised tools in order to produce a relatively standard response for Lifecycle Assessments which will be easier for officers to assess (e.g. OneClick LCA).</p> <p>Innovation</p> <p>We are pleased to see the inclusion and emphasis on embedded carbon and the innovative choice of alternative materials that this focus can lead to. One such is the increased use of timber in construction. This also has the potential of reducing the quantity of concrete in foundations as wooden structures can be lighter than traditional build.</p>	<p>Noted.</p> <p>We can consider whether it is appropriate to recommend a particular Life Cycle Assessment within the Plan or whether this issue would be better explored within a Technical Advice Note.</p> <p>Noted.</p>	<p>No Action Required</p> <p>Oxford City Action: Consider proposed wording going forward.</p> <p>No Action Required</p>
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Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R2	Welcome policy and encourage supporting text to make explicit the link to heritage conservation. Building re-use has the potential to contribute to the Council's positive strategy for the historic environment.	Support welcomed	N/A

All Public Responses – Draft Policy R3

Please let us know what you think about Policy Option Set 008c (draft policy R3): Retrofitting existing buildings including heritage assets. If you have any additional comments please put them in the comment box.

There were 153 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	56	17.83%
Agree with Preferred Option	58	18.47%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	13	4.14%
Neutral/No answer	13	4.14%
Do not know	4	1.27%
Not Answered	161	51.27%

Draft policy	Topic	Summary of comments	Response
R3	Preferred option	Support for different options in consultation e.g. some flagged support for alternative option 1, whilst others supported option 2.	
R3	BBOWT	BBOWT strongly agree with preferred option.	Support welcomed.
R3	Support for policy	Support for the Preferred option, including: the positive approach set out in the Policy in terms of retrofitting; the emphasis on a “whole building” approach; that it does not set out targets or introduce specific measures; the acknowledgement that historic buildings and heritage assets are more sensitive to change; the more nuanced approach to the retrofit of heritage assets/buildings/conservation areas.	Support welcomed.
R3	Support balancing temporary harm versus long term benefit.	Support balancing of ‘temporary harm’ vs ‘long term benefit’ and other trade-offs that prioritize climate resilience and our collective ambitions to reach net zero - against- aesthetic/heritage considerations.	Comments noted.
R3	Support retro-fit over demolition	Some comments agreeing with the need for retrofit before exploring demolition and that there are examples in the city where buildings have been demolished instead of repurposed.	Comments noted.
R3	Retro-fit of existing buildings will help cut emissions faster	A presumption in favour of fabric upgrades, heat-pump installation and solar PV on non-designated buildings will cut emissions faster than efforts to achieve net zero new-build.	Comment noted.
R3	Carbon-saving measures as a public benefit	Counting carbon-saving measures as a public benefit in Listed-Building or Conservation-Area cases gives owners a clear, workable path to decarbonise landmark stock without endless bespoke arguments.	Comment noted.
R3	Policy should go further – helping	Should go even further in encouraging historic buildings to be modernised in energy efficient ways. This might mean helping building owners to work with English Heritage to find compromises	The Local Plan policy is one tool in supporting applicants to drive retro-fit of existing buildings.

Draft policy	Topic	Summary of comments	Response
	occupants to access grants	that respect conservation goals and sustainability goals. Given how many historic buildings, Oxford has and in such a small footprint, it seems like we ought to be able to show leadership on this.	Agree that other ways to support building owners is important although this generally falls outside of the scope of the Local Plan preparation itself. Where possible we could look at how we can incorporate additional helpful guidance of relevance into our supporting technical advice note, which will need to be updated for the new Local Plan's adoption.
R3	Refuse applications which don't comply	If applications do not show compliance with the policy, then applications should be refused.	Accordance with the policy requirements will be a material consideration in the process of determining planning permission for relevant applications, as with other applicable policies in the Local Plan.
R3	If retro-fit not feasible, this should be justified by applicant	Applications proposing retrofit of buildings should be considered favourably. Where retrofitting is not feasible / viable, then applicants should seek to provide adequate justification.	The policy cannot force applicants to retro-fit or to justify why they cannot, it provides a framework for how applicable applications should approach their retro-fit projects when they come forward seeking planning permission to do so.
R3	Flexibility needed	Policy should be flexible. Also common sense is needed in application of policy. Other flagged that it may not be realistic to make retrofitting compulsory. Instead, encouraging new	Agree that flexibility is important so that each project can be designed in the most suitable

Draft policy	Topic	Summary of comments	Response
		development or refurbishing sites to take up alternative new energy and other to reduce carbon emission may be more realistic.	way for its particular context. The policy does not set rigid targets, or explicit requirements in terms of type of retro-fit that should be undertaken. Instead, it sets the framework for how to approach design of the project, including promoting a whole building approach which helps to ensure that retro-fit measures are selected which most suit the building.
R3	Concern about heritage impacts from retro-fit	Concern that policy will allow historic buildings to receive ugly external changes in order to achieve carbon reduction and undermine conservation principles.	The purpose of asking applicants to take a whole building approach to the retrofitting of traditional buildings, including heritage assets, is precisely to avoid this kind of impact (amongst other reasons). The approach means ensuring that a proposal is informed by a thorough understanding of the building, including the particular characteristics/qualities for which it might be protected, and then ensuring that design of retro-fit measures factors these qualities in.

Draft policy	Topic	Summary of comments	Response
R3	No policy wanted	Council should not interfere. There should be no policy for this topic.	Comment noted. The policy is intended to help support applicants who wish to pursue retro-fit so that they can approach these projects in the most appropriate way and avoid harmful impacts, which will enable them to be better placed to navigate the planning process.
R3	Policy is too expensive and waste of money	Concern about who will pay for the retro-fitting and that householders will be forced to retro-fit. Concern about expense generally not being justified and that policy is a waste of money that is paid for by tax payers.	The policy does not force anyone to undertake retro-fitting. Other than costs that might be associated with meeting the requirements of the policy for the applicant undertaking such a project, the policy does not directly impose costs on others in the city.
R3	Need for retro-fit may only be temporary	Heritage needs to be preserved beyond the current climate crisis. Future technical advances that may later negate the need for retrofitting.	Comment noted, however, we are unable to prepare policies based upon uncertain or unforeseen future technical advances. The policy responds to an existing need to support owners of current buildings who wish to pursue retro-fitting projects. As set out in earlier responses, the policy is intended to help ensure retro-fit projects

Draft policy	Topic	Summary of comments	Response
			that require planning permission happen in the most appropriate way whilst balancing out our responsibilities towards protecting the historic environment.
R3	Connecting to heat networks	Should also strongly encourage connection to heat networks as these (particularly where designed to operate at higher temperatures than building-level heat pumps) provide a way of decarbonising hard to treat (listed) buildings with minimal impact on their existing fabric/heritage assets. The vast majority of emissions in 2040 and 2050 will be from buildings that already exist - encouraging/mandating connections to these when retrofitting should be a key lever in the City achieving this.	Comment noted – there could be a variety of ways to secure the most sustainable outcomes from a retro-fit project including connecting to/using heat networks/heat pumps. The policy does not rigidly require applicants to utilise any one particular technology, as the best solution may differ depending on context of the building and the wider site. Equally, technology is continually evolving and it is important that the policy approach is future-proofed as best as possible. The policy sets the framework for how to approach design of the project, including promoting a whole building approach which helps to ensure that retro-fit measures are selected which most suit the building.

Draft policy	Topic	Summary of comments	Response
R3		<p>Give more explicit encouragement to carbon-reduction technologies with an externally visible aspect -- e.g. solar panels and heat pump external units -- by encouraging their use including in publicly visible locations in more circumstances.</p> <p>Still seeing advice issued that solar panels should be reduced to produce a 'balanced' roof, the implication being that panels are an aesthetic negative compared to roof tile, and that this aesthetic is important enough that we should accept increased emissions.</p> <p>Proximity to a heritage asset is also being cited as a reason to remove or minimise use of solar panels. We should constrain ourselves to only restricting solar directly upon a heritage asset or in very close proximity to a highly sensitive asset.</p>	
R3	Retro-fit against overheating	Retro fitting is important and needs to include resilience against heat.	Agreed, this is why the policy talks about retrofit measures that go beyond just energy efficiency. It highlights that the Council will support retrofit measures to existing buildings where they secure energy efficiency improvements or adaptation to changing climate. Resilience to overheating/higher summer temperatures is an important facet of adaptation to climate change.
R3	Homeowners need support	Comments about need for need expert assistance and/or funding (e.g. grants) to support people to achieve this objective.	Criterion c of the policy talks about the need for obtaining professional expertise where necessary/appropriate. The

Draft policy	Topic	Summary of comments	Response
			accompanying Technical Advice Note (TAN) will be able to point applicants to further guidance/support to some degree, as is the case in the existing retro-fitting TAN.

Statutory Consultee Responses – Draft Policy R3

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R3 Retro-fitting existing buildings	<p>Climate Action</p> <p>The reference to the adaptation benefits of retrofit is welcomed.</p> <p>Reference should be made to the need to maximise reuse and retaining of materials where possible during retrofit in order to reduce the embodied carbon of the proposal.</p>	<p>Noted.</p> <p>We can consider whether to include this reference in the Reg. 19 plan. Reuse and retention of materials is already covered within Policy R2.</p>	<p>No Action Required</p> <p>Oxford City Action: Consider proposed wording going forward.</p> <p>Oxford City Action:</p>

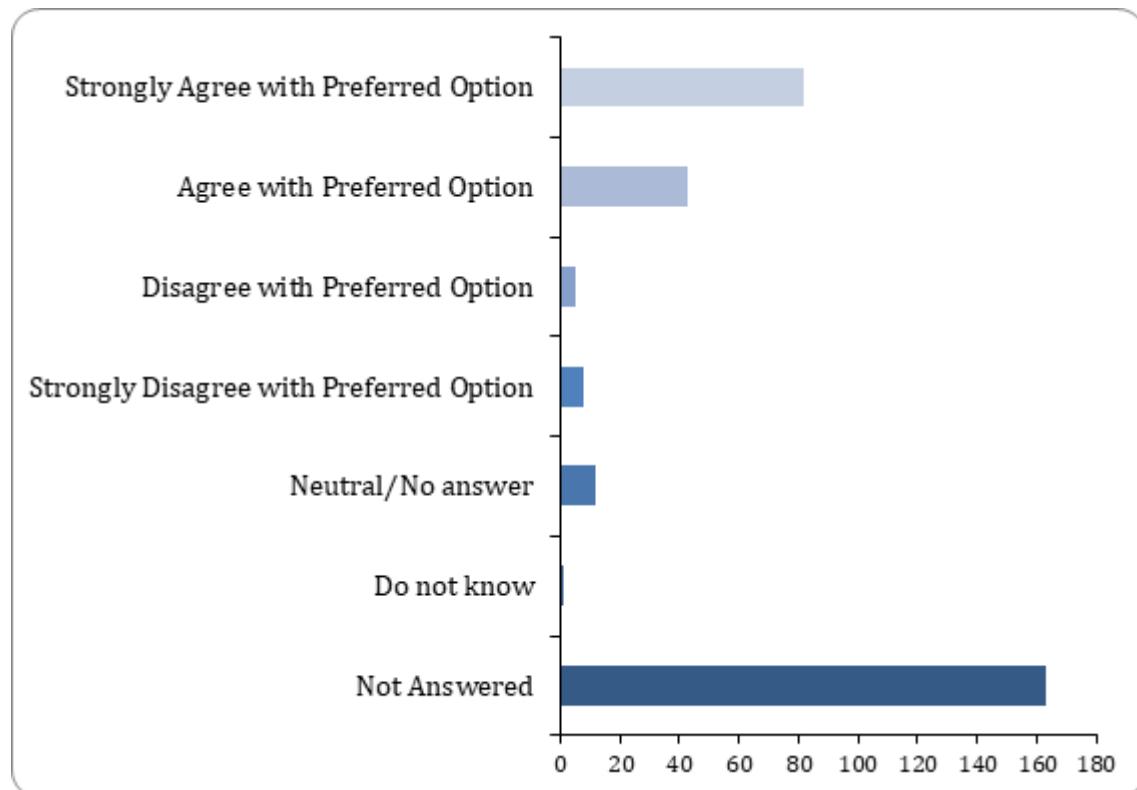
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	<p>Suggest inclusion of a statement about post-implementation monitoring e.g.,</p> <p><i>The Council may request post-completion monitoring of retrofit outcomes for major schemes to support continuous learning and city-wide performance improvements.</i></p> <p>Retrofit proposals should also consider their impact on natural resources including air, water, and soil, and take opportunities to mitigate environmental harm.</p> <p>Urban Design (Placemaking)</p> <p>Retrofitting of buildings should also encompass improving accessibility for all, some heritage assets do not offer step free access.</p>	<p>We can consider whether to include some text about post-implementation monitoring for retrofit schemes however compliance with any such statement would be entirely voluntary and we would not need a planning policy to ask for such information. This issue may be better addressed through an “Informative” on decision notices.</p> <p>Noted.</p> <p>Policy R3 addresses retrofit measures in relation to energy efficiency and climate change adaptation.</p>	<p>Consider proposed wording going forward.</p> <p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p>

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	<p>Also, policies throughout the local plan refer to conserving/protecting heritage assets, so retrofitting buildings could also include physical measures e.g. Boundary treatments, to provide a level of protection if a hostile incident occurred.</p>	<p>Where development involving heritage assets is proposed, this are specifically covered by policies HD1-5.</p>	

All Public Responses – Draft Policy R4

Do you have any comments on Policy Option Set 009a (draft policy R4): Air Quality Assessments and Standards. If you have any additional comments please put them in the comment box.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	82	26.11%
Agree with Preferred Option	43	13.69%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	12	3.82%
Do not know	1	0.32%
Not Answered	163	51.91%

Draft policy	Topic	Summary of comments	Response
R4	Preferred option	Various comments supporting option 1	
R4	BBOWT	Strongly support preferred option.	Support welcomed.
R4	Preferred option	Strongly support preferred option – target is more ambitious than elsewhere.	Support welcomed.
R4	Air quality a serious health issue.	Agreement that air quality is a serious health issue. Also comment that no development is more important than healthy children and clean air.	Agreed, the health impacts of poor air quality is a key driver for why we are proposing the policy.
R4	No need for local policy which goes beyond national requirements.	<p>National planning guidance already mandates Air Quality Assessments – some also commented that these are restrictive enough.</p> <p>Layering a blanket Oxford-specific AQA plus a tighter 30 µg/m³ NO₂ cap on every major scheme simply adds modelling fees, lengthens determinations and squeezes viability, yet cannot cure the dominant pollutant source—regional road traffic—without city-wide transport reform.</p>	<p>Any level of air pollution can have detrimental impacts for health including the minimum acceptable targets required nationally. The Council's air quality action plan is a key strategic document which captures the local ambitions for driving improvements in air quality in the city beyond national minimums. Whilst there are a range of initiatives for tackling air quality across various sectors outside of the Local Plan's influence, the Local Plan's policies play a role in ensuring that new development is designed in alignment with this wider strategy for the city by ensuring that new developments are not permitted which would conflict with these local ambitions.</p>

R4	No need for local policy	No need for extra micro-managing by the city, or 'don't need a local policy' more generally. Concern about increasing layers of regulation and policy requirements.	Comment noted – see other responses (e.g. above) for why we believe a local air quality policy is necessary.
R4	Need common sense.	Need common sense.	Comment noted.
R4	Relationship between transport and housebuilding.	<p>Inclusion of transport within housebuilding criteria is long overdue. Estates and developments should be designed with a presupposition that car travel is not the norm.</p> <p>Some general comments were made about the need for vehicle movements need to be reduced as far as possible, and that even hybrid and EVs are responsible for various non-exhaust emissions. Other comments included that the policy is not effective as it only addresses air quality, not the wider problems caused by traffic. That the Local Plan does not acknowledge Oxford's responsibility to tackle climate change by reducing the factors that lead to congestion and emissions. Nor does Local Plan offer solutions relating to reducing car traffic.</p>	<p>It is important to note that the Local Plan has limited influence over the transport network as much of this sits within the wider County Council's control.</p> <p>However, we acknowledge the strong need for reducing reliance on private vehicles and the various roles they play in contributing to air pollution and wider issues relating to congestion in the city. The policy is clear (in criterion a) that Air Quality Assessments need to consider the impacts of all the sources of air pollution generated during the development's operational and construction phases, including but not limited to transport. Separately, Chapter 7 sets out various policies in relation to supporting and encouraging more uptake of sustainable/active transport modes and seeking to ensure</p>

			occupants do not have to rely upon on private vehicles wherever possible.
R4	Parking at Headington hospitals	Oxford can (via planning) reduce destination parking especially at the Headington Hospitals.	
R4	Impact of wood-burning needs to be addressed.	Air Quality assessments are meaningless if the impact of wood-burning is not addressed (even from so-called eco-stoves).	Noted – air quality assessments would need to consider all sources of air pollution.
R4	Local Plan does not define areas of poor air quality.	Policy does not define areas of poor air quality..	Whilst there are monitored hotspots for more regularly occurring poor air quality in the city – such as those which are monitored and reported upon on the Oxonair website, the nature of the problem is that air pollution can arise from various sources and be transient or temporary in nature – e.g. where it relates to construction processes or changes in traffic patterns and can be difficult to map. We have incorporated a link to the council's air quality webpages and the above county wide mapping within the supporting text.
R4	Change reference to mitigation to 'net-zero'	The word mitigation must be replaced with 'net-zero'	The term net zero more broadly means to ensure no net increase – e.g. in the context of carbon emissions, it means ensuring the

			same amount of carbon dioxide is removed from the atmosphere to balance out anything emitted and ensure no overall net increase as a minimum. Mitigation is a broader term, but is effectively about avoiding, or else seeking to reduce the severity of impacts.
R4	Policy needs to be enforced.	Stressed that the policy needs to be enforced. Concern flagged about pollution impacts arising from various major developments in the city including Cherwell House, the Old Power Station, Network Rail, Gibbs Crescent, and that this is not reflective of a 'world-class city'. This includes periods when residents cannot open windows even in a heatwave and pollutants coating streets.	Similar to our earlier responses against policies R1 and R2, the policy sets the requirements that will need to be met through the planning application. The permission would be granted subject to a condition that the development is built in accordance with submitted documents. Were an applicant to fail to build in accordance with the condition they could be subject to enforcement action.
R4	Objection – Headington Hospitals parking provision (and others)	The policy and goals are ineffective without urgent reduction of Headington Hospital (John Radcliffe, Churchill and NOC) car parking provision. The three Headington Hospitals, football fields of staff car parking (70%) is mostly responsible for air quality, health and environmental issues caused by vehicles in Oxford as a whole, as the centre of transport and employment is now Headington, causing miles of traffic jams every day and gridlocking Headington and Oxford in general.	Comment noted, however, parking provision at the hospitals is not within the scope of this policy.

R4	Increase pedestrianised areas.	Pedestrianised areas must be increased; the number of 'through' roads in residential areas should be decreased; walking and cycling networks of high quality should be joined up throughout the City as a long-term goal Plan after Plan.	Comment noted – the Local Plan has various policies which seek to support walking/cycling/wheeling (chapter 6).
R4	Is noise factored into policy?	Does air quality include noise? I used to live in countries where heat pumps are normal, and there is no such thing as a quiet heat pump.	Noise would be addressed through separate Policy R8.
R4	Council should prioritise	Agree with principle but feel that Council should prioritise and be less concerned about issues which are felt to have limited/no impact on city-wide air such as personal home-use bbqs and bonfires, which are part of the importance of quality of life.	Comment noted – the policy covers the design and operation of new development, it is unable to control how occupants behave in the development.

Statutory Consultee Responses – Draft Policy R4

Oxfordshire County Council

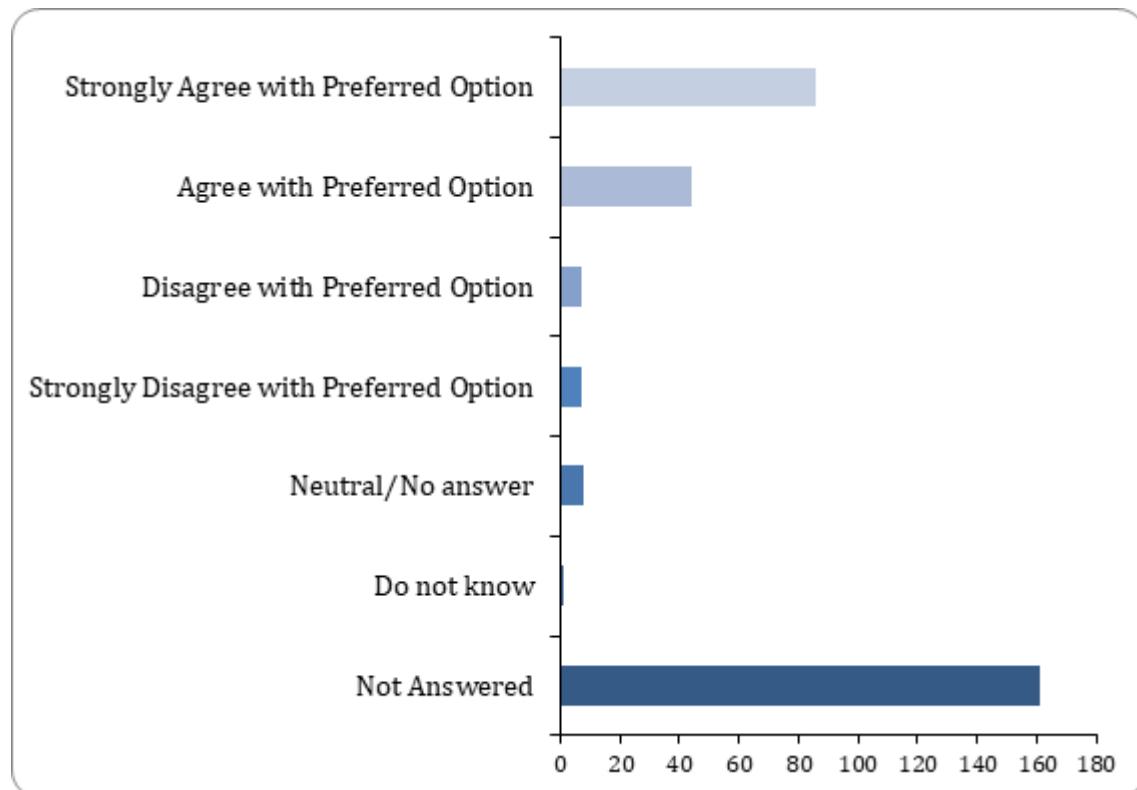
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R4 Air Quality Assessments and Standards	<p>Strategic Planning</p> <p>Air quality is a particular issue for Oxford, and the entire city is an Air Quality Management Area.</p> <p>Transport schemes and transport policy that the County Council is working on with the City Council have an aim of improving air quality.</p> <p>Public Health</p>	Noted.	No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	<p>The inclusion of sensitive receptors (schools, nurseries, care homes and healthcare settings) is welcomed, although developers should also be considering the impact of schemes on outdoor amenity such as parks and greenspaces, especially where young children are likely to play.</p>	<p>Noted. The list of sensitive uses set out in the policy is not exhaustive.</p>	No Action Required

All Public Responses – Draft Policy R5

Please let us know what you think of Policy Option Set 009b (draft policy R5): Water Quality and Resources. If you have any additional comments please put them in the comment box.

There were 153 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	86	27.39%
Agree with Preferred Option	44	14.01%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	8	2.55%
Do not know	1	0.32%
Not Answered	161	51.27%

Draft policy	Topic	Summary of comments	Response
R5	Preferred option	Comments supported different options e.g. some flagged support for alternative option 1, whilst others supported option 2.	
R5	BBOWT	Strongly support preferred option.	Support welcomed.
R5	General support	Comments supported the policy generally including that anything to support the improvement in city's watercourses is welcome.	Support welcomed.
R5	Need for strongly emphasising using water prudently and protecting water quality so as to not allow new development to further exacerbate pollution problems in watercourses.	Comments about need for strong emphasis on using water prudently and for protecting water quality, and that new development should not be allowed to exacerbate water pollution problems or have an adverse affect on water bodies or groundwater. There were also general comments flagging ongoing concern about the pollution issues impacting the city's watercourses and the role of water companies and new development in this problem.	Comments noted – this new policy has been incorporated into the Local Plan 2045 to ensure the issues around water resources and water quality are taken seriously and considered as part of applications. The policy is being further updated following the Reg 18 feedback and we have sought to emphasize these messages within the supporting text to the policy also.
R5	Bespoke policy is unnecessary.	Preference for folding water requirements into other policies. Bespoke policy duplicates requirements such as Building Regs' cap of water use to 110lppd, as well as EA regulation of foul-and-surface-water discharge, as well as the Local Plan's other policies such as Flood-Risk/SuDS. Bespoke policy would mean applicant's need to prepare another consultant report and also push marginal brown-field schemes further from viability.	The building reggs optional 110 lppd standards need to be enforced through local policy. The EA, along with various other stakeholders, have also put forward a strong preference to us that a bespoke water quality/resources policy is needed (indeed ever since preparation of Local Plan 2040). The policy's development is being informed by Whole Plan viability

			assessment which will consider any viability impacts arising from it, as with all policies in the Local Plan.
R5	Bespoke policy is unnecessary.	No need for bespoke policy/interference from the Council and/or national policy is sufficient.	See response above.
R5	Importance of grey water reuse and stronger requirement in policy.	Various comments about need for incentivising/requiring grey water capture and reuse. Suggestion that Council could work with Thames Water to inform constructors of cost-saving implications of water-saving measures. Also that the policy could be more strongly worded in terms of mandatory inclusion of designs to use grey water. One suggestion to require all new builds to have water re-use from basins/showers/baths to flush toilets. Another suggested a change to wording by removing the words 'where appropriate': "All applications should demonstrate what other measures have been incorporated into the design to conserve water use including rain/grey water harvesting/reuse where appropriate."	Comments noted and we agree that grey water and rainwater recycling is an important way to help conserve water resources. We have expanded on the policy requirement in the supporting text to further emphasize the variety of measures applicants might be able to consider and that might be suitable for their proposal. The wording 'where appropriate' was intended to reflect that each application will be different and different measures may be suitable for each proposal – we will consider further whether this is necessary.
R5	Lawns are not sustainable – grey/rainwater should at least be used to maintain them.	Passion for lawns in the Colleges is ecologically unsustainable on water management and biodiversity grounds. At the very least, Colleges should be using grey water for watering these. Terrific systems being applied at the scale of households in both Germany and Australia that make really good use of grey water.	Maintenance and management of existing green spaces is something that is not within the scope of the Local Plan to influence. We concur with the importance of making use of grey and rainwater recycling wherever possible, see above comment.

R5	Sewage	<p>Concerned that the issue of sewage discharge and treatment is barely referred to at all, which is totally incompatible with the plans to build large number of houses in Oxford and the surrounding area. There is an assumption that Thames Water will provide the necessary upgrades to the water treatment plant at Sandford-upon-Thames ("Oxford STW") in a timely fashion to meet the large increase in wastewater discharge resulting from the large-scale developments proposed in the draft local plan. Any approval for residential development needs to be contingent on appropriate foul network and treatment facility upgrades being completed before any occupation of new development is permitted. The proposed Policy R5 is insufficiently robust and will, if not substantially amended, lead to an increase in pollution which will impact on peoples' health – including those using the watercourses for pleasure or work or other uses.</p>	<p>Comments noted - We have sought to ensure that the supporting text for the policy in the Reg 19 Local Plan emphasises the ongoing water quality concerns in the city, and the various impacts contributing to this including sewage discharges, alongside other updates to the policy to strengthen where practical. The Council continues to engage with Thames Water to ensure that they are aware of growth planned for in the Local Plan and that this can be accommodated and the supporting text will also encourage applicants to engage directly with them as early as possible as proposals come forward.</p>
R5	Threshold for foul and surface drainage is too high.	<p>Policy Threshold for requiring a Foul and Surface water drainage is set too high. Smaller development can also impact the sewage network (both individually and cumulatively). Threshold should be set much lower, i.e. 10 dwellings or more. Strategies should consider existing developments' impacts before development allowed.</p>	<p>The requirement seeks to ensure the largest developments go further to demonstrate how foul and surface water will be managed through a strategy because they could have particularly significant impacts. It is acknowledged smaller scale development can still have an impact and the policy will still</p>

			require proposals of smaller scales of development to demonstrate how they have mitigated impacts that are within the applicant's control.
R5	Improvements to Sewage treatment works should be monitored through the policy.	Various stages of improvements promised for the Sandford Treatment works should be monitored by the Council and the results obtained made available for public inspection as part of the suggested policy.	Whilst the upgrades to the sewage treatment works are an important step in addressing water quality concerns in the city, they are not directly in the control of this policy or the Local Plan and as such this would not be the correct mechanism through which to undertake the monitoring suggested.
R5	Water shortages should be addressed.	All new planning applications must address the issue of water shortages which is clearly going to be a real problem during the timeline of the draft plan.	Agreed. The new policy is intended to present the issue of prudent water use more clearly through the Local Plan (where previously water use requirements were spread across various other policies) and sets various requirements for new development to address in relation to this issue.
R5	Impact on water bills	Concern requirements will mean increases in water bills.	It is unclear why or how the new policy would directly drive increases in water bills. Indeed, the policy should help to ensure that new development reduces its impacts on the water

			environment, and by extension, associated infrastructure that maintains this.
R5	Retention of green frontages to properties to deal with drainage issues	Abandon unenforced SuDS maintenance as an idea and have a local policy requiring retention of earth/grass/other vegetation on frontages for all properties to deal with recurring drainage issues.	Addressing the issue of surface water run off requires a variety of responses and design measures. Equally, SuDS can take many forms, including areas of natural green space and other features. We concur, that limiting artificial surface cover on new developments is important (for a wide range of issues) and would direct you to other policies, including the new Urban Greening Factor requirements (draft policy G3) which seeks to ensure new developments have areas of natural surface cover.

Statutory Consultee Responses – Draft Policy R5

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R5	<p>Strategic Planning</p> <p>We welcome the introduction of a separate policy which deals with water resources and support the</p>	Noted.	No Action Required

Water Resource and Water Quality	<p>setting of a policy which require all dwellings (including conversions, reversions and change of use) to achieve an estimated water consumption of no more than 110 litres per person per day, and encouraging all non-residential development to demonstrate what measures have been incorporated to reduce water use.</p> <p>Minerals and Waste Policy and Strategy</p> <p>The County Council is responsible for wastewater treatment, Policy W10 of the Oxfordshire Minerals and Waste Core Strategy (2017) allows for proposals for the treatment and disposal of wastewater and sewage sludge.</p>		
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Environment Agency

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R5	Welcome the inclusion of water quality policy, but currently find it unsound as it is not robust in relation to addressing water quality concerns. Policy does not meet requirements of paragraph 187e of NPPF which requires plans and planning	Whilst we are keen to ensure that the policy meets the EA's expectations and responds to the requirements of the Water Framework Directive, it is	Meeting organised to discuss these comments with the EA and agree amendments to the policy that might overcome these concerns.

	<p>decisions to ensure that there are no unacceptable levels of water pollution. Appropriate measures must be in place to ensure; delivery of growth does not outpace required wastewater infrastructure improvements and growth does not lead to a deterioration of the water environment. Development must only be permitted where it can be demonstrated that there is adequate provision for the treatment of wastewater in place to prevent wastewater leakage into the environment including rivers. This is to maintain and improve waterbody status in Oxford as required under Water Framework Directive. Suggest a few changes/amendments to the policy wording but are willing to work with Council regarding how the policy wording could be strengthened.</p>	<p>important that the policy requirements are justified and deliverable in terms of what can be expected of a developer making an application. We would propose a meeting in order to discuss these comments further with the EA in order to find the best way to respond to these concerns and strengthen the policy where possible.</p>	
R5	<p>Pleased to see emphasis on separation of foul and surface water drainage. Should also highlight the hierarchy of drainage options that must be considered and discounted in the following order: 1. Connection to the public sewer 2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation) 3. Septic Tank. This must be considered when applications are made for wastewater/sewage/foul water disposal from all new development. In a sewered area such as Oxford City, private</p>	<p>We will reflect on how best to reflect this feedback in the Local Plan where appropriate, bearing in mind that some of this is set out in national guidance and may not necessarily need to be repeated here. Some of these considerations may be better reflected in supporting text or a Technical Advice Note. Again, we would like to discuss further with you.</p>	As above.

	<p>discharges to non-mains drainage systems must be avoided in line with the hierarchy of options. Deep infiltration systems for non-mains foul drainage or surface water disposal are not optimal discharge solutions, and should be avoided wherever possible. Techniques and designs which treat and manage rainwater and surface water drainage without allowing the runoff to soak into the ground (infiltration) is necessary for protecting groundwater sources. Changes suggested to policy for consideration.</p>		
R5	<p>There are important and sensitive water resource receptors in Oxford such as designated bathing water at Wolvercore Mill Stream which should be recognised within the local plan policy, with a commitment to working to achieve and maintain sufficient status of these sensitive receptors. Changes suggested to policy for consideration.</p>	<p>We agree with the suggested change to bullet point two of the policy, we will also look to flag the presence of designated bathing water in the supporting text as it is useful context.</p>	<p>Amend to policy wording to reference designated bathing water. Reference to be added into supporting text also.</p>

Thames Water

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R5 Water resources and quality	<p>Important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and</p>	<p>It will be important to continue to work together to ensure that Thames Water are aware of the Local Plan's provisions and that necessary</p>	<p>Continue to engage together. We would aim to document this as part of a Statement of Common Ground in due course.</p>

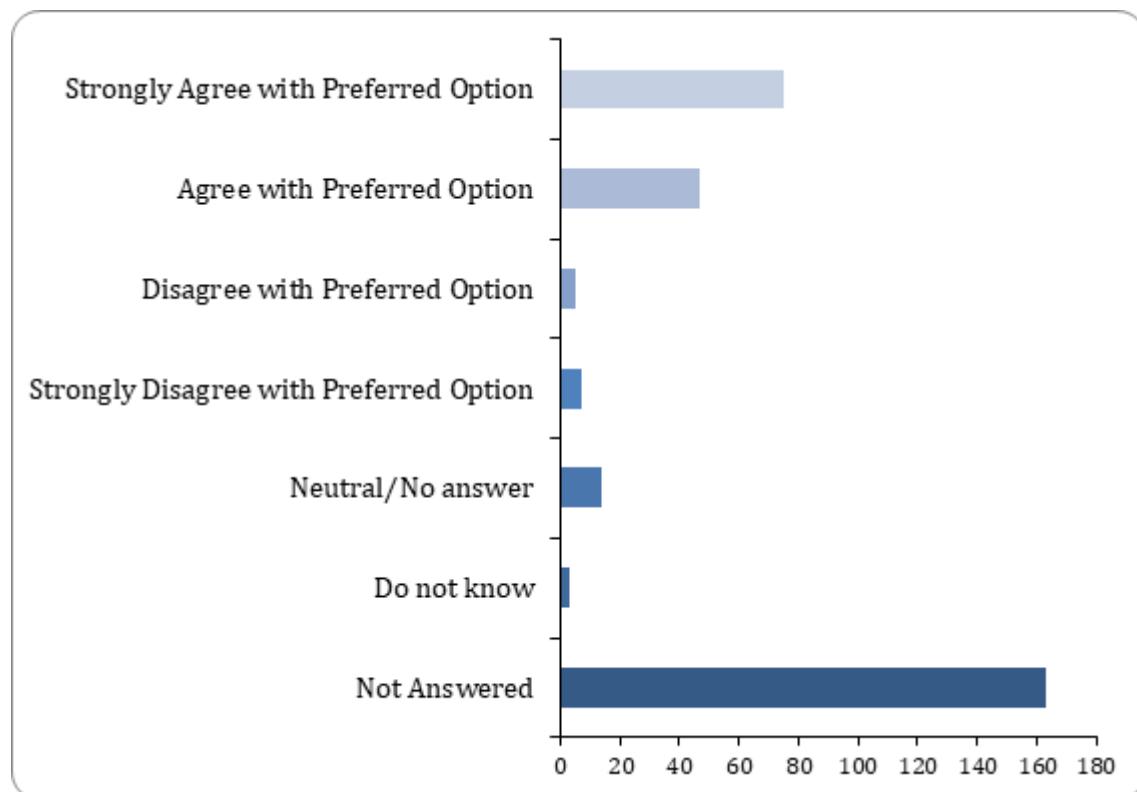
	wastewater infrastructure to serve all new developments.	upgrades to infrastructure are planned for accordingly.	
R5 Water resources and quality	<p>Recommend that developers engage with them at the earliest opportunity when bringing forward a proposal to establish the following:</p> <ul style="list-style-type: none"> • The demand for water supply and network infrastructure both on and off site; • The demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. <p>Also flag that time to undertake upgrades to infrastructure can be lengthy, so early engagement from developers is important where possible. Thames Water offer a pre-planning service to assist applicants (on their website).</p>	<p>Noted, we concur it could be helpful to reiterate the recommendation of early discussions between developers and Thames Water where possible and can add this into supporting text to the policy.</p>	Updated policy to be published as part of Reg 19.
R5 Water resources and quality	Support references to water efficiency and requirement of the water efficiency standard of 110 litres per person per day using the fittings approach. This is an important tool to help sustain water supplies for the long term, particularly in light of future climate change. This should be required by condition.	Support welcomed. We can make it clearer in supporting text that the requirement will be subject to a condition.	Updated policy to be published as part of Reg 19.
R5 Water resources and quality	Additional wording suggested to the policy in relation to requirements for conditions to ensure occupation aligned with delivery of upgrades, and about when development or expansion of water supply or waste water facilities would be permitted.	The Council does not currently consider these as necessary or helpful additions as they can be dealt with through existing mechanisms/other policies,	No change proposed at this time.

	but we would be happy to discuss further.	
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All Public Responses – Draft Policy R6

Please let us know what you think about Policy Option Set 009c (draft policy R6): Soil Quality. If you have any additional comments please put them in the comment box.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	75	23.89%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	14	4.46%
Do not know	3	0.96%
Not Answered	163	51.91%

Draft policy	Topic	Summary of comments	Response
R6	Support for policy	Generally support policy, or support option 1	Support welcomed.
R6	BBOWT	Strongly support preferred option.	Support welcomed.
R6	No bespoke policy needed	No bespoke policy should be included. Duplicates requirements of DEFRA's Code of Practice, the Environment Agency's permitting and the Building Regulations. Additional local requirements would make redevelopment of brownfield edges and former allotments more complex, lengthen geotechnical investigation phases and push up costs, yet deliver marginal environmental gain in a city where peat outcrops are rare. Streamlining makes land recycling swifter and more affordable.	The Local Plan policy reflects the Council's priority for conserving and enhancing the natural environment, and soils are a key dimension of this. It will help to ensure applicants evidence how they have considered impacts on soils and sets out a consistent list of principles which we would look for applicants to respond to. Some of the references flagged in the comment are guidance to assist developers only (e.g. DEFRA code of practice). Where applicants need to undertake some of the same actions to meet other regulatory requirements, they can use this as evidence for how they have met the policy. The additional requirements around development in proximity to peat reserves responds to the limited national protections for these deposits despite the particular importance of their protection in

			light of their relatively finite nature and the various benefits they provide.
R6	Current wording is too restrictive	The impact of the consideration of soil quality in all development proposals (as the policy is currently worded) would further restrict the opportunities for development. This could further sterilise development opportunities on sites where there are other conflicting constraints on the site.	The policy simply asks that applicants demonstrate how they have sought to mitigate impacts on soils and taken up opportunities for conserving and enhancing them. Additional requirements are set out for protecting the limited remaining peat reserves on undeveloped land in the city, for the reasons outlined in the above response. We feel that this is a pragmatic approach, without being overly prescriptive, which seeks to ensure the design of new development takes soils into account and limits further damage where possible.
R6	No bespoke policy needed	Council should not micro-manage and/or no need for bespoke local policy (no further reason given).	Comment noted, see above responses for why we consider a local policy is important.
R6	Objection – lack of clarity	Policy should define clear rules and metrics.	As a new policy for the Local Plan, we have sought to frame its requirements in the most practical and effective way possible. Every proposal will be different, and each site in the city will have a different context (e.g.

			varying levels of historic development, varying quality of soils), thus it is challenging to set strict rules/metrics). The policy flags key considerations which applicants need to demonstrate they have responded to in relation to soils. These generally cover the broad ways development can impact on soils but will be of varying relevance to each application depending on what is proposed. Additional sensitivities around the city's remaining peat deposits have prompted more specific requirements (e.g. not allowing losses or dewatering of peat as a result of new development, and assessing potential for impacts on undiscovered peat in near vicinity to known deposits).
R6	Unclear on impact for pitches	Unclear on what impact policy has for new playing fields or improvements to existing ones. Sport England has detailed guidance on the provision of new grass playing field available on their website.	Where a proposal relating to pitches requires planning permission and would meet the thresholds in the policy, the application would need to respond to the requirements in the same way as other types of development.

R6	Addition to policy needed	Addition to policy needed in a local by-law requiring retention of degraded peat areas identified in the Oxford City Council area, pursuant to a general policy of restoring them through re-wetting and promoting the return of wetland biodiversity using Lye Valley as seed source.	The Local Plan sets a framework through its policies for how new development should happen in the city, including where this should come forward, what standards it should meet and how impacts on the wider environment need to be avoided/mitigated. Whilst this new policy seeks to protect existing deposits of peat from loss due to development, regardless of their condition, as well as asking applicants to mitigate impacts on soils more generally, it is beyond the Local Plan's scope to require general restoration of deposits in the city. This would need to be pursued through other mechanisms outside of the Local Plan's control.
R6	More mapping of peat needed.	Welcome the precautionary 200m buffer around known peat reserves, however, stress that Council should actively be mapping peat (making use of local sources of info) and not just rely on Natural England mapping. Mapping should be included on policies map.	It is outside of the resources of the Council to pursue active investigation and mapping of additional areas in the city unfortunately. We intend to include peat reserves on the policies map to aid applicants.
R6	General comment on threats to peat	Peat is at risk from climate change (particularly hotter/drier summers). Need to find ways to ensure peat stays wet and protected	We concur that peat reserves are an important store of carbon –

		<p>such as by preserving green spaces in catchment, reducing the ongoing threats to existing reserves e.g from erosion due to surface water run off after storms. Also favouring fen restoration in city (e.g. Lye Valley LWS).</p> <p>Another comment flags that peat conserves carbon better than a tropical rain forest so restoration is an elementary necessity for UK Climate policy.</p>	<p>this is one of the reasons for the new policy requirements around recorded peat reserves in the city – and that they are under threat from various pressures including climate change. As referenced in response earlier, whilst the Local Plan can include certain requirements in relation to mitigating impacts from new development on these important reserves, there are limitations to what else is within the scope of the Local Plan’s influence – such as driving improved management of these areas.</p>
R6	Objection	<p>Peat reserves should be identified including Lye Valley, Dunstan Park, Headington Hill north slope (along A40) (Ruskin, Larkin’s Lane Field), along with demarcation of groundwater and surface water catchments.</p> <p>The 200m buffer is considered to be entirely arbitrary. Once a report is written, what are the metrics to permit or not permit the development?</p>	<p>We intend to identify recorded peat reserves on the policies map to assist applicants. In the absence of clearly defined best practice, we identified the 200m buffer in liaison with Natural England to be a pragmatic and proportionate area to investigate around recorded deposits in acknowledgement that there could be additional deposits which are not well recorded.</p>

Statutory Consultee Responses – Draft Policy R6

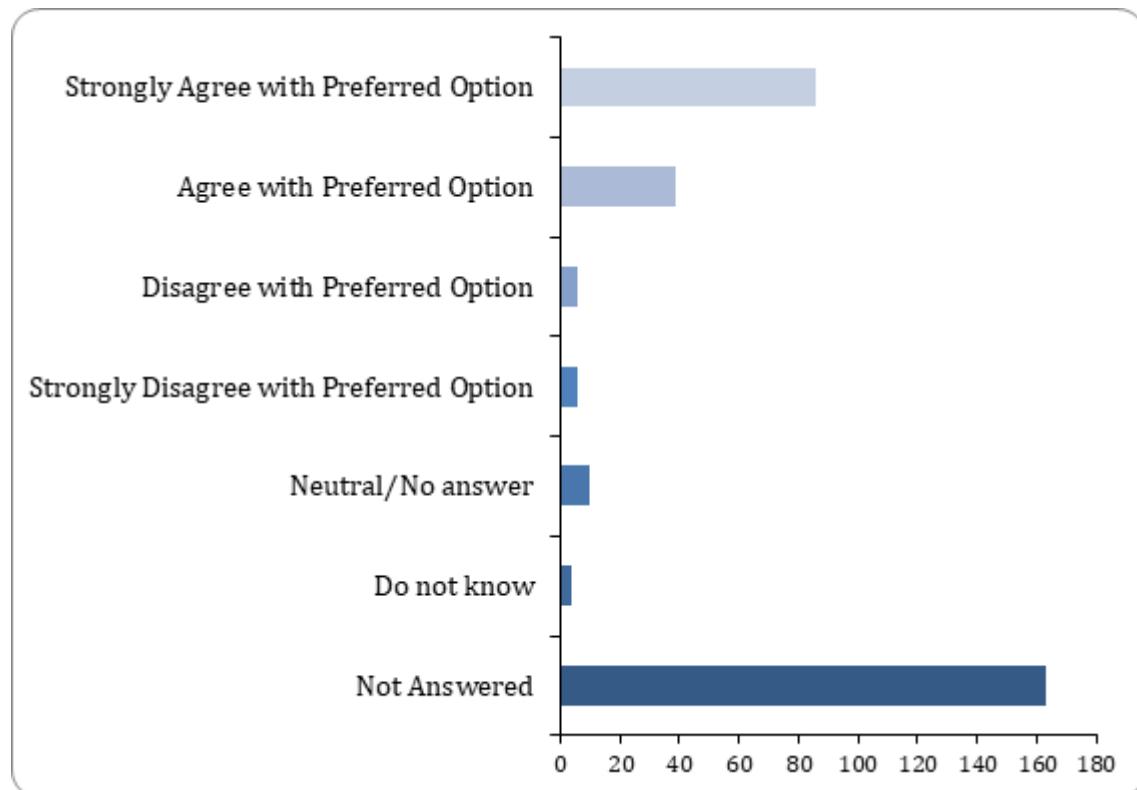
Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R6 Soil Quality	<p>Landscape and Nature Recovery – Biodiversity</p> <p>It would be useful to define what is considered 'highest quality soils' in the context of this policy. For example, nutrient poor soils would have a high value for biodiversity and creating species rich grassland habitats but a lower value for activities such as agriculture that would value a high nutrient soil content.</p>	<p>We will seek to provide a definition of 'highest quality soils' in the Reg. 19 version of the plan.</p>	<p>Oxford City Action: Consider proposed wording going forward.</p>

All Public Responses – Draft Policy R7

Please let us know what you think about Policy Option Set 009d (draft policy R7): Contaminated Land. If you have any additional comments please put them in the comment box.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	86	27.39%
Agree with Preferred Option	39	12.42%
Disagree with Preferred Option	6	1.91%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	10	3.18%
Do not know	4	1.27%
Not Answered	163	51.91%

Draft policy	Topic	Summary of comments	Response
R7	Preferred option	Some general support for preferred option	Support welcomed.
R7	No need for bespoke policy.	No bespoke policy needed. Duplicates requirements of Part 2A of the Environmental Protection Act, the NPPF and the Environment Agency's Land-Contamination Risk-Management guidance. Local policy results in another report, validation step and more professional fees, with no material gain in public health or environmental protection. Streamlining supports brownfield schemes viability and allows new homes/worksites to be delivered quicker.	The Local Plan policy reflects the extensive nature of historic land uses in the city which could give rise to potential risks from contamination and the need for this local context to be taken into consideration when developing sites in Oxford. It sets out the specific local requirements which the Council will need to see addressed to be satisfied that potential harms arising from contaminated land have been appropriately responded to.
R7	No need for bespoke policy.	No need for bespoke city policy – no further reason.	Comment noted, see response above.
R7		Couple of issues flagged with wording which states that responsibility for securing a safe development rests with the developer and/or landowner. Lack of records about a site's remediation could mean subsequent development may undermine measures/expose problem again - proposed plans for developing Bertie Park given as example. Also does not specify a role for the local authority who may/may not have records of the previous contamination and remediation which applicant should be aware of. Council should be able to access a comprehensive record of previous contamination for remediated land.	The wording relating to responsibilities for securing a safe development lying with the developer/landowner are simply reflective of national policy. In relation to the Council's role, the draft policy sets out the requirements for the supporting information which the Council is asking proposals for new development to be accompanied by and which it will be assessing

			the application against. The supporting text for the policy will set out that the Council will refer to its own records of potentially contaminated sites when assessing whether land contamination is an issue, as well as other information sources.
R7	Thames water and contamination of water.	Concerns with trusting that Thames Water will be able to deal with wastewater and clearing up potential contamination of water. Would like to know more about the recent agreements made by Oxford City Council with Thames Water and Environment Agency.	Concerns noted. Information relating to the agreed upgrades for the Oxford Sewage Treatment Works were published online earlier in 2025.
R7	Risk of explosions after failed remediation	Concern about risk of explosions happening in new development areas because remedial measures have not been taken before the site was developed.	The policy sets out the assessments that the Council will expect applicants to undertake where there are potential risks of contamination, and requirements around any remediation where necessary. Where site investigation and remediation measures are needed, these will be required as a condition of any planning permission.

Statutory Consultee Responses – Draft Policy R7

Environment Agency

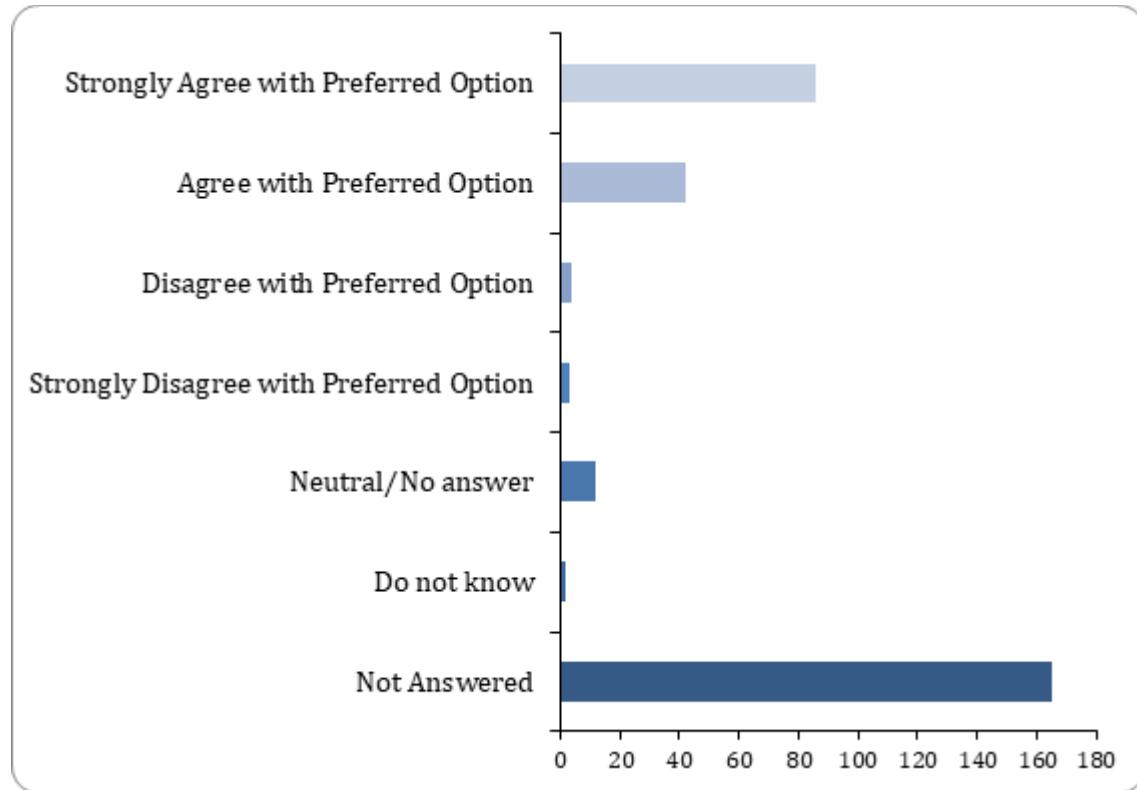
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

R7	Policy wording should be amended to ensure the requirement for a Preliminary Risk assessment in the first instance is included. This should be the initial assessment to be undertaken in an area where there is suspected contamination. Changes suggested to policy for consideration.	We agree with these changes, subject to a couple of minor tweaks, this will be reflected in the Reg 19 draft.	Policy R7 updated
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All Public Responses – Draft Policy R8

Please let us know what you think of policy options set 009e (draft policy R8): Amenity and environmental health impacts of development. If you have any additional comments please put them in the comment box.

There were 149 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	86	27.39%
Agree with Preferred Option	42	13.38%
Disagree with Preferred Option	4	1.27%
Strongly Disagree with Preferred Option	3	0.96%
Neutral/No answer	12	3.82%
Do not know	2	0.64%
Not Answered	165	52.55%

Draft policy	Topic	Summary of comments	Response
R8	Preferred option	Some general support for preferred option and/or need for policy addressing amenity generally as well as that the Local Plan should support making Oxford neighbourly and help promote good collaboration between roads.	Support welcomed.
R8	Need to do better in future compared to previous developments in city.	Concern that amenity impacts have not been considered previously to detriment of existing residents and existing buildings. Examples such as over-development of Mill Street area, development in west Oxford quoted in some comments. Also comments that future developments need to be better.	Comments noted.
R8	Support wording re: Impacts on waste and wastewater.	Support the mention of impacts on waste and wastewater. Concerns about Thames Water being able to deliver.	Comments noted and support welcomed, see responses to comments against policy R5 which discuss these issues further.
R8	Support, with suggested addition	Support policy but wording in the Joint South and Vale Local Plan should be considered for inclusion in Oxford Local Plan also: "protect landscape character, dark skies and the natural beauty of the countryside in development decisions'	Comment noted – however the city's urban setting differs significantly to other more rural areas. The policy does set out that planning permission will only be granted for development that ensures that the amenity of communities, occupiers, neighbours and the natural environment is protected.
R8	No need for bespoke policy	No need for bespoke policy – no further reason given. Another comment suggested national requirements are sufficient.	Comment noted – the Local Plan policy brings together all of the key amenity impacts of particular relevance to developing in the city. It is considered important for

			ensuring that applicants appropriately address these issues as part of their proposal so that the amenity/environmental health of existing residents as well as future ones are protected.
R8	Support for the agent of change principle	Support the “agent of change” advisory principle (para 5.36) to protect valuable music and cultural venues	Comment noted - we have also flagged readers to the agent of change requirements of the NPPF in supporting text.
R8		<p>Amenity of existing users of public amenities like recreation grounds should also be protected. New MUGAs can be noisy. Placement near housing means considering not only the rights of occupiers, but the rights of young people to have a place to go.</p> <p>Buffer zones are particularly important in this regard. Ignoring this simply sets up a situation where conflict that could have easily been predicted will then require management - with implications financially and social/health impacts.</p>	The policy seeks to ensure that new development (regardless of proposed use) is designed appropriately to mitigate any relevant impacts on existing users, whilst also ensuring design is appropriate so as to protect amenity of users of the new development. Whether particular buffer zones are needed, and the specifics of what these should entail, will be highly dependant on location and types of uses proposed and this is difficult to specify in the Local Plan policy. See comment below regarding buffer zones.
R8	More clarity needed re: requirements for noise assessment	Wording at end policy in relation to noise and when noise assessment needed is very unclear. Should be written simpler and with targets, such as decibel levels and distance of buffer zones.	The requirements for any assessment will depend upon the particular context of the location where development is proposed.

			We may be able to provide additional guidance through a supporting technical advice note and will consider this in due course.
R8	Impacts of noise pollution	Noise pollution is often overlooked but has been widely shown to be detrimental to health.	Agreed that noise is an important health issue, which is part of the reasoning for why it is included as a consideration in the policy.
R8	Stronger policy requirements re: light pollution	Stronger policies needed for reducing light pollution, by requiring all existing and new developments to have lighting which is targeted, proportionate and sensitive. Increased use of very bright/poorly designed lighting in commercial and domestic development has negatives for people and nature.	We have expanded on the wording in the design checklist in the Local Plan appendix relating to external lighting about the need for lighting. The Local Plan's requirements would not be able to be retrospectively applied to existing developments.
R8	Various issues which should be covered in the policy.	'Etc' should include increased risk of flooding, loss of privacy, pedestrian and bicycle congestion as well as vehicular.	The criteria as set out in the draft policy address these issues to varying degrees, other than flooding – which is addressed through separate policy requirements (see policies G7 and G8 of chapter 4).
R8	Policy should apply to construction too, and also mention public engagement.	Clause also needed to include during construction of these new proposals/developments and strong local public engagement to be undertaken.	The supporting text to the policy will make clear that impacts from development include not only the development in operation but also during the construction process. Public engagement during the planning process is a

			wider consideration than just this policy, there are no particular demands relating specifically to this policy (and not to others) that would warrant its explicit reference here.
R8	Policy should be expanded in relation to HMOs.	Preferred option needs expansion: enlarging existing HMOs should be obstructed on car parking, noise, amount of council bins required and any other applicable grounds.	The policy sets a framework of amenity/environmental health considerations which apply to all types of developments – though to varying degrees depending on the specifics of the proposal. This would already encompass applications relating to HMOs.

Statutory Consultee Responses – Draft Policy R8

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R8 Amenity and Env. Health impacts of developments	Minerals and Waste Policy and Strategy Welcome reference under point l) regarding impact on waste and wastewater infrastructure. Policy W11 of the Oxfordshire Minerals and Waste Local Plan Core Strategy 2017 prevents the permission of development that would directly or indirectly prevent	Noted.	No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	or prejudice the use of a site safeguarded for waste management.		

Thames Water

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R8 Amenity ad environmental health	The new Local Plan should assess impact of any development within the vicinity of existing sewage works/sewage pumping stations in line with the Agent of Change principle set out in the NPPF. Note that this is recognized at paragraph 5.37 of the draft Local Plan.	Without having specific detail about how individual sites would come forward, it is unclear how this would be achievable or beneficial without being subject to a lot of uncertainty. We have added in requirements for odour assessments where applicable in policy R8 in response to another comment from you. The Agent of Change principle will continue to be referenced in the policy.	No further change proposed at this time.
R8 Amenity ad environmental health	Where development is being proposed within 800m of a sewage treatment works or 20m of a sewage pumping station, the developer or local	Thanks for the suggestion, we will add additional wording into the policy to	Updated policy to be published as part of Reg 19.

	<p>authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station. The odour impact study would establish whether new resident's amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer – and would be in line with various paras in NPPF and PPG. Additional wording suggested in relation to requirements for technical assessment looking at potential of odour impacts.</p>	<p>expand on expectations in relation to odour in proximity to the sewage treatment works.</p>	
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Sports England

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R8	Definition of 'unacceptable transport impact'	Sports England flag that where new sports facilities are proposed this may mean additional traffic. But there is no explanation of 'unacceptable transport impact' is.	What would result in an unacceptable impact will be highly dependant on the nature of the location, existing

			network, and what development is proposed.
R8	Impact on applications involving lighting	Sports England have concern about how policy applies to planning applications for sports lighting or lighting of streets to support active travel. Gives no acknowledgement of the benefits of outdoor sports lighting or street lighting to providing health communities. Policy strongly favours 'the amenity of communities, occupiers, neighbours and the natural environment'	Undoubtedly there are valid reasons for various types of lighting as part of new development, however, a balance needs to be struck between needs of the development and managing impacts on neighbouring uses. The policy is focused on ensuring that this balance informs the design process.
R8	Impact on sports facilities	Sports England also concerned about how this applies to new outdoor sports facilities. The policy offers no context for applicants as to when a noise assessment will be needed, so it may be required for very minor planning applications. Sport England's planning guidance on 'Artificial Grass Pitches Acoustics Planning Implications' may be helpful for the development of this policy. The agent of change principle also works the other way, for example, housing development should not be located near existing 'noisy' uses such as existing MUGAs, artificial pitch facilities or playing fields with sports lighting. There does not appear to be a policy that expands on paragraph 200 of the NPPF so it is recommended that this is also developed.	The requirement for noise assessment will be highly dependent on the context including location, type of development proposed and is challenging to define explicitly. We will consider whether additional guidance could be helpful as part of a Technical Advice Note in due course. The supporting text will make it clear that amenity considerations apply both to impacts created by new uses, but also impacts arising from existing uses, and that both dimensions need to inform the proposal.

All Public General Responses to Chapter 5

Draft policy	Topic	Summary of comments	Response
Chapter 5	Supportive	Various comments providing support for policies in this chapter.	Support noted and welcomed.
Chapter 5	Need for sustainable development	Comment across all policies about need for promoting sustainable development, climate adaptation, energy efficiency and offsetting adverse environmental effects.	Agreed, the policies of chapter 5 (and in part chapter 4 in relation to adaptation) are intended to promote these topics.
Chapter 5	Solar PV arrays	Object to placing large swathes of solar PV in Green Belt areas. Council should prioritise maximising solar PV on all rooftops both residential, community, commercial.	The Local Plan does not allocate greenfield land for solar PV, nor does it seek to encourage this. See also responses against policy R1 below.

