

# Chapter 7 – A Liveable City with Strong Communities and Opportunities for All

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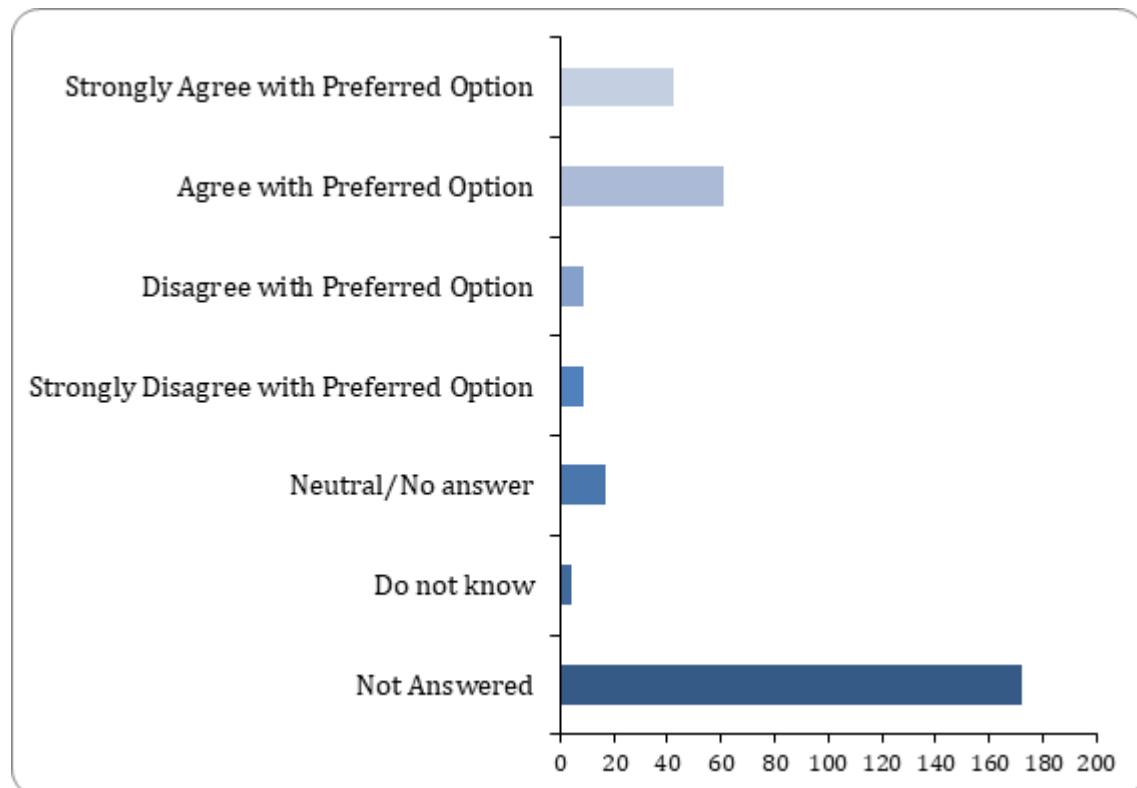
## Headlines for Chapter 7:

- Reinvigoration of the City Centre, particularly support for more specialist shops and less empty retail spaces
- City centre needs a community-based club providing leisure, sports facilities and third spaces for families and young people
- More pedestrian, cycle and wheel infrastructure needed
- New homes need to be within walking distance of retail and services
- Developers must be required to include cycle racks
- Some disagreement with the removal of mandatory parking spaces in new developments
- Developers need to be encouraged to provide EV charging in new residential dwellings

## All Public Responses – Draft Policy C1

Please tell us what you think of policy option set 013a (draft policy C1): Focusing Town Centre Uses in existing centres.

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	42	13.38%
Agree with Preferred Option	61	19.43%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	17	5.41%
Do not know	4	1.27%
Not Answered	172	54.78%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
C1	More homes in centres	Policy should encourage homes, e.g. above shops/other businesses.	Policy C2 makes it clear upper storeys may be used for housing.
C1	List of facilities for town centres	It is noted that 'community facilities' are referenced, but not specifically uses pertaining to education and learning. Templars Square currently includes existing education and learning facilities, therefore, these uses should be included as suitable.	The policy is about where new Use Class E and other main town centre uses will be permitted, and education and learning facilities do not fall into these categories, but it is not to say they won't be permitted in these locations.
C1	Do not separate town centre uses by type or location	A more flexible policy that encourages a mix of uses across different centres and does not limit student accommodation/hotels to the larger centres would better support community cohesion.	The local centres are not generally considered suitable locations for new student accommodation.
C1	Hierarchy of Centres	In broad agreement with the hierarchy of centres defined in the Plan. However, the city centre should be differentiated from the District Centres as the highest order centre in the hierarchy.	There is not a difference between what would or wouldn't be permitted in the city centre compared to the district centres, so there is no need for the differentiation.
C1	Out of centre development	Where out of centre development is proposed, the implications of its comparative accessibility by non-sustainable modes of transport should be included as a policy criterion and reflected in	The policy does require that, if an out of town location is justified by the sequential test it must then

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<p>the assessment of its impacts on the city centre. If a higher level of dedicated parking provision is deemed necessary than for equivalent uses in the city centre, then this should be identified as a conflict with Draft Policy C8 (Motor Vehicle Parking Design Standards) since it confers competitive advantage on such locations and would be contrary to the sustainable transport objectives of the Plan. As such, it will require a commensurately higher level of public benefits in the overall planning balance to outweigh the policy conflict.</p> <p>.</p>	demonstrate good connectivity by sustainable travel and that impacts on the road network are mitigated. In response to this comment, additional wording about minimising parking has been added.
C1	Threshold for retail impact assessment	<ul style="list-style-type: none"> <li>• The requirement for retail impact assessment for proposals for out-of-centre developments exceeding 350m<sup>2</sup> should be justified in the Plan given the default threshold of 2,500m<sup>2</sup> in the NPPF. It is assumed to reflect to the oversupply of retail and leisure floorspace in the city, as evidenced through widespread repurposing of such floorspace for other purposes in the city centre, and endorsed by the evidence base<sup>1</sup>. This needs to be clearly stated in the Plan. This requirement for a costly assessment is not justified and the approach does not support 15-minute city goals.</li> </ul>	Given the overall aims of the plan is to ensure sustainable modes of travel, any proposals in less accessible locations could be particularly damaging to these aims, and the requirement for retail impact assessments from small out of town units is considered justified.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
C1	Flexibility within Use Class E	Caution against limiting the flexibility to change between uses within Class E, if that is what is foreshadowed in paragraph 7.3, bullet 5, which would be contrary to the Government's intentions through the Use Classes Order and permitted development regime, and prejudicial to the commercial imperative to be able to respond to rapid changes in the retail and leisure industries as foreshadowed in NPPF, para. 90(a).	There is no intention or means to prevent change within Use Class E.
C1	Supportive	Cyclox are pleased to note that you are aspiring for residents to be within 20 minutes' walk or a short cycle ride of most services. This will encourage people to walk or cycle and is consistent with your overall aims.	Support is welcomed.
C1	Additional local centres	The policy should define additional Local Centres such that all homes (or say 95%) are within a 15-minute walk of a Local Centre. Some potential additional local centres were mentioned: Littlemore; Greater Leys; Botley Road; Abingdon Road/New Hinksey, Lower Wolvercote, Cutteslowe, Kassam area when development happens.	The NPPF is very clear that defined local centres and 'town centres' suitable for town centre uses, and that they must be more than a small parade of shops of significance only to the immediate neighbourhood. These smaller centres in many cases

Draft policy	Topic	Summary of comments	Response
C1	Headington district centre boundary	Headington District Centre includes Bury Knowle Park. This is not effective and not justified. It is therefore unsound as most of the uses are clearly inappropriate for a Core Green Space such as Bury Knowle Park.	Bury Knowle Park has strong protection as part of the Core Green Infrastructure Network. It is in the district centre as a key part of the offer of the centre that is part of its attraction to the community (including the library), but it does not mean that town centre uses would be permitted on the park.

## Statutory Consultee Comments – Draft Policy C1

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome
Draft Policy C1 – City, District and Local centres	<p><b>Transport Strategy</b></p> <p>At paragraph 7.1 – It would be beneficial to acknowledge here that there are areas of Oxford which suffer from severance from the city centre due to the road ring road and the barrier this creates around the city.</p>	Noted. We can consider whether adding a reference to severance is appropriate in this section of the plan.	Oxford City Action: consider inclusion of text

Draft Policy	Summary of comment	Response	Outcome
	<p>Adding reference to Oxfordshire becoming a Marmot Place would be welcome to showcase how this can help tackle health inequalities and support Oxford in becoming A Liveable City with Strong Communities.</p> <p>Suggest adding wording which plays emphasis on the benefits Mobility Hubs will bring. For example, support LTCP targets and provide transport choice for the residents of Oxford.</p> <p>The opening sentence is not clear on the definition of mobility hub. It reads that the city and district centres as a whole, are mobility hubs. This sentence should be reworded and provide clearer language. One example could be:</p> <p>“The city and district centres include a range of mobility hubs (refer to Mobility Hub Strategy) helping to create places which are highly accessible.”</p> <p><b>Public Health</b></p>	<p>We note that Oxfordshire County Council is initially focussing on three of the Marmot Principles and has developed a number of projects aligned to them. We can consider whether to add a reference to the plan on this issue.</p> <p>We do not consider this cross reference is necessary as mobility hubs already feature in the LTCP.</p> <p>A Definition of Mobility Hub is contained in the Glossary of the Local Plan.</p> <p>We will ensure that any text about Mobility Hubs provides clarity as to what they are.</p>	<p>Oxford City Action: consider inclusion of text</p> <p>No Action Required</p> <p>Oxford City Action: consider inclusion of text</p>

Draft Policy	Summary of comment	Response	Outcome
	<p>This appears to be the only policy which contains any reference to hot food takeaways (HFTs). While we support the notion that proposals for new HFTs will not be permitted outside of the city, district or local centres, this doesn't go far enough to adequately restrict unhealthy food environments.</p> <p>There should be a standalone policy focusing on the restriction of HFTs and, similar to many other local authorities in the UK, this should specify a minimum 400m/ walk buffer zone from schools.</p> <p>From March 2025 the new National Planning Policy Framework contains an explicit direction to 'prioritise preventing ill-health' stating that local planning authorities should refuse applications for hot food takeaways and fast-food outlets that are near where children congregate (unless in a designated town centre).'</p> <p>In Oxford, children living with excess weight is concentrated in some areas, particularly more deprived areas (in some cases with levels of excess weight being over 40%) and close to local centres where there are already hot food takeaways (proliferation –</p>	<p>We are not considering the inclusion of a stand-alone policy on HFTs. Our policy approach broadly aligns with the national policy approach as it does not allow HFTs outside designated centres.</p> <p>The NPPF definition of town centres states that:</p> <p><i>References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance.</i></p> <p>The inclusion of a 400m buffer zone policy in Oxford would effectively increase opportunities for HFTs in additional locations across the city that are outside the city, district and local centres.</p>	<p>City and County Council officers met to discuss the County Council comments on Hot Food Takeaways. Following on from that meeting, no changes have been proposed. However, the County Council still consider a location policy approach to Hot Food Takeaways as described in their response should be included in the plan.</p>

Draft Policy	Summary of comment	Response	Outcome
	<p>increasing numbers of hot food takeaways is linked to higher levels of excess weight).</p> <p>To both tackle excess weight and health inequalities, the wording of the Oxford Local Plan should be strengthened by including a standard restriction on any new hot food takeaways within 400m radius of any school AND by not allowing new hot food takeaways in geographical areas with consistently higher levels of excess weight in children – above the Oxfordshire and England averages. Given the geography of Oxford City the wording could be “no new hot food takeaways will be granted within 400m radius of any school or in any geographical areas with higher levels of excess weight in children than the England or Oxfordshire average (with the exception of within Oxford City Centre).”</p> <p>Similar wording has been incorporated into Local Plans elsewhere. There is backing data to support this approach readily available from the public health team – including accurate excess weight data for children and number and type of hot food takeaway (including proliferation in areas of excess weight).</p> <p>A Healthy Weight Health Needs Assessment undertaken in 2023 found frustration amongst Oxford</p>		

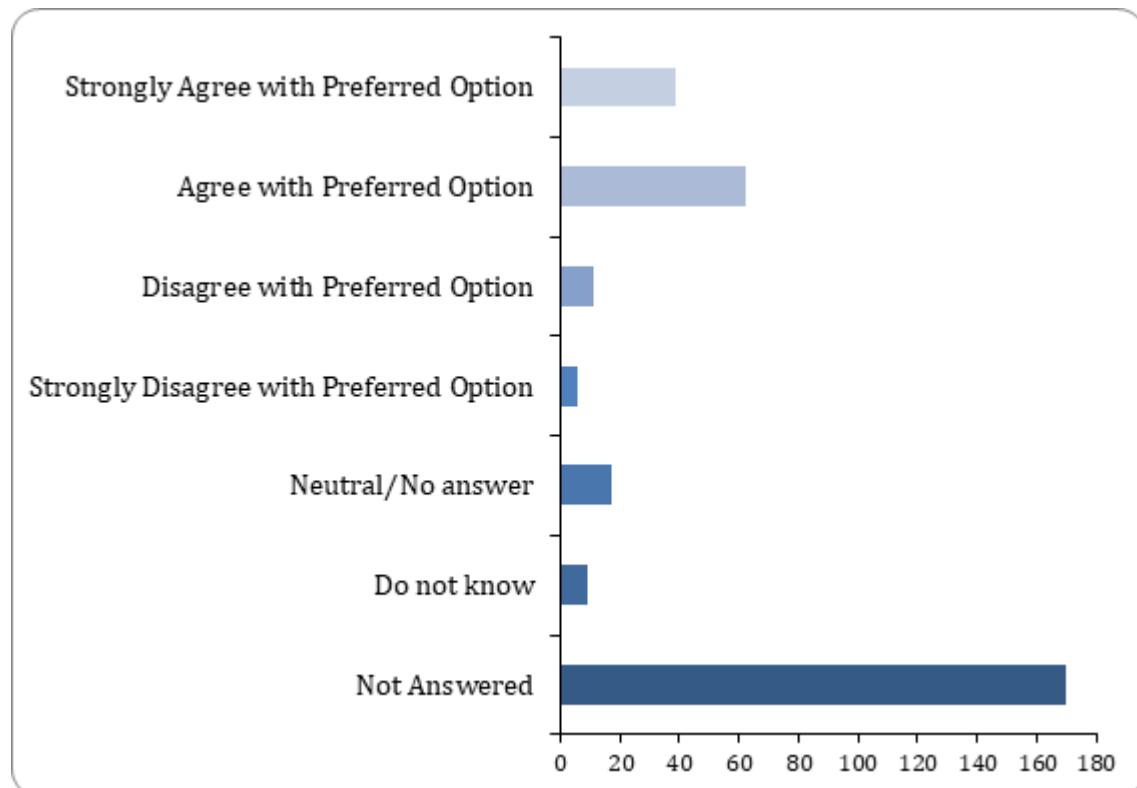
Draft Policy	Summary of comment	Response	Outcome
	<p>City population of the easy access to 'fast food' close to home leading to increased likelihood of consuming this which has higher calorific as well as fat, sugar and salt content.</p> <p>The suggested change links to local policy. Oxfordshire Joint Health and Wellbeing Strategy 2024-2030 as part of immediate actions for healthy people and healthy places on page 20 (published Jan 2024): Take opportunities to shift the environment toward being healthier – advertising healthy options rather than food or drink high in fat, salt or sugar, and restricting the introduction of new hot food takeaways.</p> <p>A letter from Oxfordshire's Health Overview and Scrutiny Committee to the Head of Planning and Chief Executive urged Oxford City to take this approach.</p> <p>The Local Plan cannot effectively deliver its vision for Oxford to be a healthy, inclusive and fair city without such a policy. The County Public Health team can support City Council officers, share detailed data on the subject and support a draft modification of the Local Plan.</p>	<p>We disagree that the inclusion of such a policy would mean that the Local Plan does not effectively deliver its vision. Especially as the proposed approach in the plan to restrict HFTs</p>	

<b>Draft Policy</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
		to the city, district and local centres only is aligned with national policy.	

## All Public Responses – Draft Policy C2

Please tell you what you think of policy options set 013b (draft policy C2): Maintaining vibrant centres.

There were 144 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Preferred Option</b>	39	12.42%
<b>Agree with Preferred Option</b>	62	19.75%
<b>Disagree with Preferred Option</b>	11	3.50%
<b>Strongly Disagree with Preferred Option</b>	6	1.91%
<b>Neutral/No answer</b>	17	5.41%
<b>Do not know</b>	9	2.87%
<b>Not Answered</b>	170	54.14%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
C2	Change away from retail/Class E is needed	<p>Too many empty shops/the ongoing repurposing of Class E floorspace is evidence of oversupply and shows it's clearly time to allow a change away from retail.</p> <p>Centres should reflect the wide variety of uses that serve different communities.</p> <p>Non Class E uses make an important contribution to overall vitality and viability and maintaining investment that protects against physical decline.</p>	Use Class E is a very broad Use Class, allowing a very wide range of facilities within the thresholds (as well as the thresholds allowing many other uses as well).
C2	Setting Use Class E threshold inappropriate	<p>The NPPF does not set prescriptive targets for active frontages in District Centres, although it does encourage the vitality and vibrancy of centres overall.</p> <p>Setting a threshold in this manner will ultimately restrict the opportunities available to modernise and respond to the change in retail and shopping habits since the Covid-19 pandemic.</p> <p>Retention of existing thresholds (para. 7.4, bullet 7) that are a snapshot of current trading profile, operator representation and market circumstances may not facilitate the essential and rapid response to dynamic retail and leisure markets and could impact negatively on the longer-term vitality and sustainability of centres.</p> <p>With resi above there will be considerable pressure on ground floor space which will also need to incorporate residential</p>	All the thresholds are set comfortably above current levels. In addition, the policy does allow significant flexibility, in allowing for justification of falling below the Use Class E threshold, as well as by Use Class E relating to a very wide range of uses.

Draft policy	Topic	Summary of comments	Response
		<p>entrances, escapes for upper floor uses, bins and bike store, all of which have a space requirement at ground floor.</p> <p>Where comprehensive redevelopment of a site in a District Centre is proposed then compliance with any threshold is not required, but instead demonstrated 'maximisation' of active non-residential frontage is required.</p> <p>Further consideration is also required on what is currently deemed as an 'active frontage' within the Templars Square site ie. Internal vs external to the shopping centre. The current policies map suggests that internal areas are 'shopping frontage'. We do not consider this is correct. An active frontage is an outward facing unit/frontage, CBRE and ORVIL can assist with the process of defining the existing active and street facing frontages on the Templars Square site.</p>	
C2	Supportive	Some comments in support of various aspects of the policy including that there's a suitable level of flexibility.	The support is welcomed.
C2	Unclear policy/clarity suggestions	Comment policy is not effective as it is unclear and comment that the first sentence requires amendment or the addition of further text or bullet points to reference the city and district centres.	Agreed- this has been amended.

## Statutory Consultee Comments – Draft Policy C2

Oxfordshire County Council

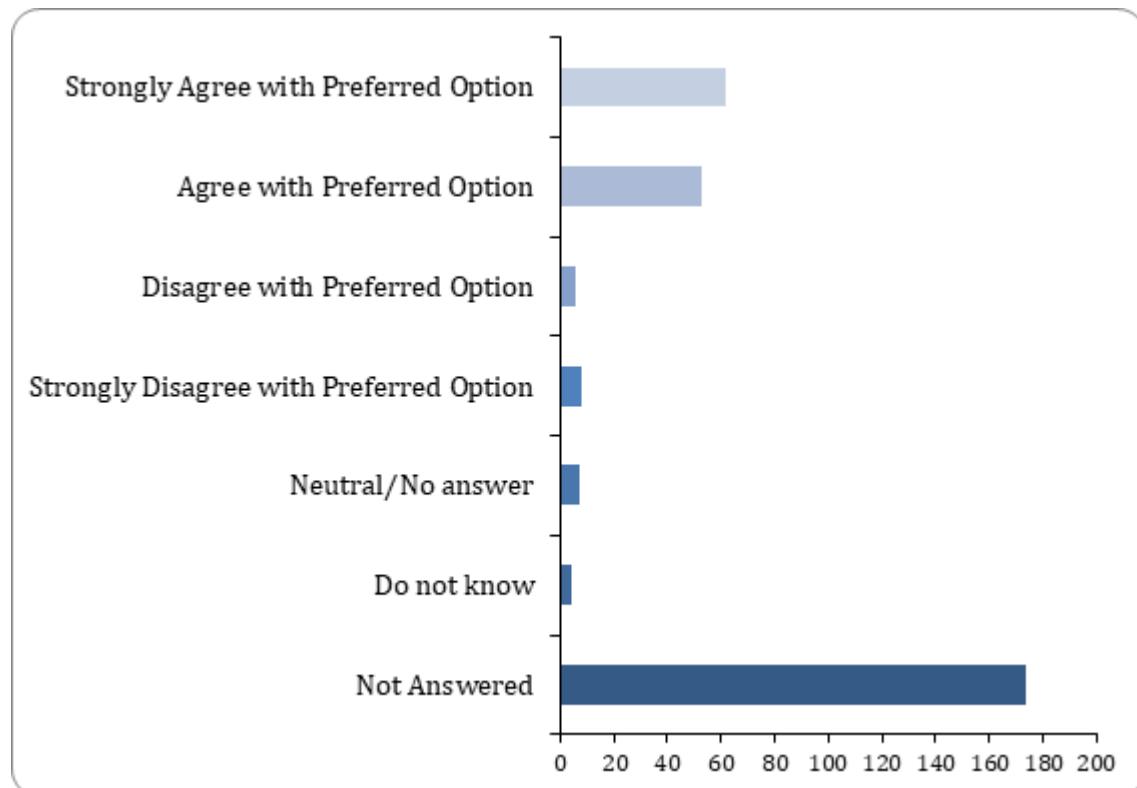
Draft Policy	Summary of comment	Response	Outcome
Policy C2 Maintaining Vibrant Centres	<p><b>Transport Strategy</b> This policy should state Oxford City Council will incorporate the County's future Street Design Code which includes a Kerbside Strategy (anticipated later this year or early next year).</p> <p>Suggested wording: The densification and growth of district centres and the city centre is encouraged. High density development is generally expected in the city centre and district centres as set out in Policy HD8, and this should be low car and have incorporated OCC's Street Design Code”</p> <p>Including stronger language would benefit the following:</p> <p>e) rationalisation of public car parking so it is well-located-limits and reduces surface-level parking where possible, and makes better use of workplace surface-level car parking;</p> <p>f) public realm improvements for cycling -<del>sts and</del> <del>pedestrians and public transport users and</del> <del>rebalancing of the space within streets from vehicles to pedestrians</del>; by providing cycle parking in convenient locations which benefit the public realm</p>	<p>We can only include references to adopted/ published strategies.</p> <p>We do not see the need to cross reference other policies in the plan in this instance. The plan should be read as a whole. As the County's Street Design Code is not yet published, we cannot make reference to it.</p> <p>This change weakens the policy as it does not support “well-located” public car parking.</p> <p>The amendments proposed seem to prioritise public realm improvements for cycling and focus on cycle parking (Policy C7 already covers cycle parking requirements). As such, the proposed changes to are not accepted.</p>	<p>Oxford City Action: Watching brief for County studies publication</p> <p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p> <p>Policy C7 below re: children's bikes)</p>

Draft Policy	Summary of comment	Response	Outcome
	<p>using thoughtful inclusive design and materials, catering for standard and non-standard bikes, including children's bikes</p> <p>g) Public realm improvements for pedestrians and public transport users and rebalancing of the space within streets from vehicles to pedestrians.</p> <p>Within active frontages page 154, it would be helpful to include a sentence referring to maintaining active frontages through inclusive design to ensure accessibility and a positive experience for people.</p> <p><b>Urban Design (Placemaking)</b></p> <p>Paragraph 7.4 – some reference should be made in relation to densification around city/district centres, it is important to still ensure there is some open/public space for people to dwell, rather than expect everyone to pass through.</p>	<p>Policies covering the design of development proposals are covered elsewhere in the plan (e.g., Policy HD7 – High Quality Design).</p> <p>Bullet point h) of the policy makes reference to new opportunities for public realm and the incorporation of small green spaces where people can dwell, 17ocialize and play.</p>	<p>No Action Required</p> <p>No Action Required</p>

## All Public Responses – Draft Policy C3

Please tell us what you think about policy options set 013c (draft policy C3): Protection and Alteration of Existing Local Community Facilities.

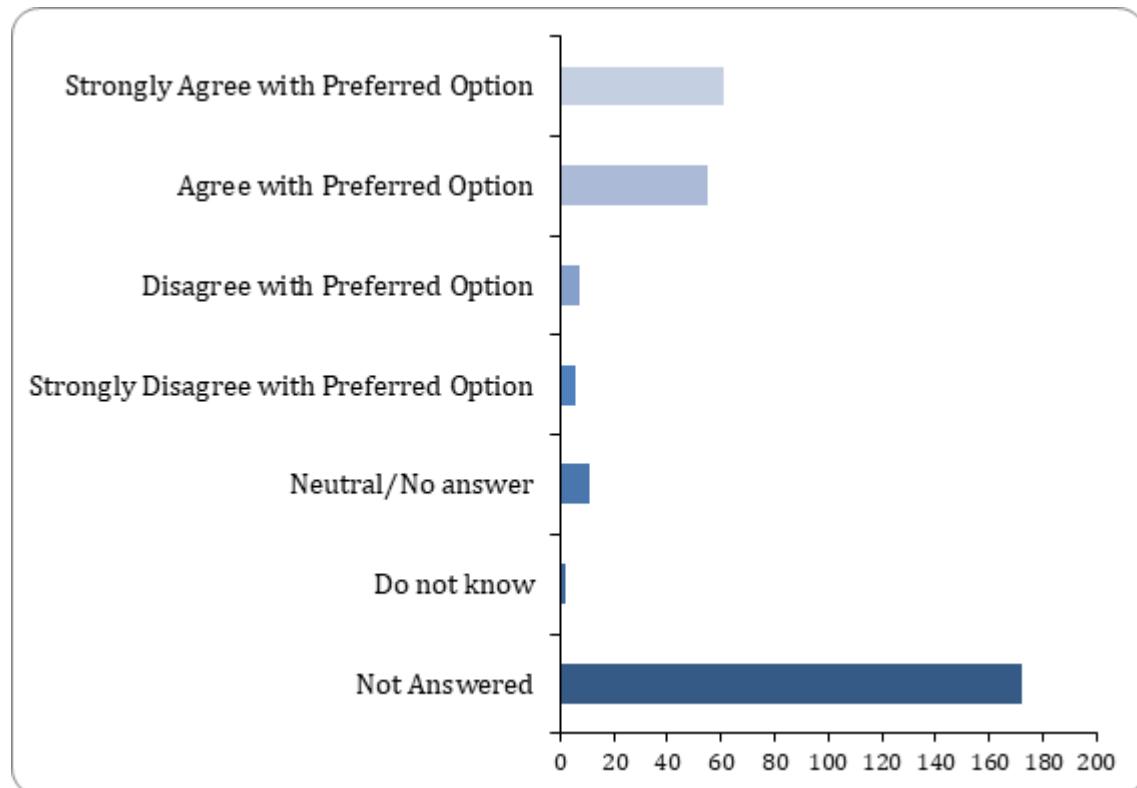
There were 140 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Preferred Option</b>	62	19.75%
<b>Agree with Preferred Option</b>	53	16.88%
<b>Disagree with Preferred Option</b>	6	1.91%
<b>Strongly Disagree with Preferred Option</b>	8	2.55%
<b>Neutral/No answer</b>	7	2.23%
<b>Do not know</b>	4	1.27%
<b>Not Answered</b>	174	55.41%

Please tell us what you think about policy options set 013d (draft policy C3): Provision of New Local Community Facilities

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	61	19.43%
Agree with Preferred Option	55	17.52%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	11	3.50%
Do not know	2	0.64%
Not Answered	172	54.78%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
C3	Exception to the policy should be applied to major sites	The policy relating to small-scale shops should be clarified to be clear that it is relating to individual isolated small shops that serve localised and more isolated communities.	The policy does say it applies to shops meeting the definition of Use Class F2-but brackets have been added to spell out what this is in terms of size and having no other facility within 1,000m.
C3	Greater protection needed.	Only like for like replacement should be allowed, following extensive community engagement. Loss of parts to fund other things is not sustainable.	It is considered important that the policy does allow flexibility for more modern or efficient combined facilities that respond to current needs.
C3	Do not protect community assets or be cautious about over protection	A few comments saying there should be no protection of community assets, including because there should be no meddling in assets not owned by the City Council (and whether the City Council should own assets it does should be reviewed). Also because protecting chronically under-used facilities or those duplicated nearby or that could be more efficiently provided in a mixed-use development would be more useful. If replacements/contributions are proportional or there are other facilities in walking distance then they should be lost.  Too much expectation may mean developments don't happen at all.	Regardless of ownership, community facilities can be really important for many social and quality of life reasons. There is no evidence at all that Oxford has chronically under-used facilities, and the policy does have flexibility to make a case for variations in provision.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
C3	Supportive/ support with minor comments	Some support of protections. Comment that some spaces are not safe for all, e.g. some churches may not feel welcoming to LGBTQIA+ or other faiths, so not a community facility for all.	Comment noted.
C3	Use of colleges	Make the universities share facilities. Require private developer and college contribution to existing assets.	The policy does say that opportunities will be taken to secure community use and joint user agreements.
C3	Access	Not clear why these new facilities must be easily accessible by sustainable transport, but commercial developments and new housing not subject to the same tests.	New developments are generally subject to these requirements, but also it is the case that community facilities by definition attract people, so they must be able to travel there sustainably.
C3 & C6	Community-led regeneration	Would like to see policy to discourage vacant properties and support community-led regeneration e.g. introduce “meanwhile uses” and council using CPO and High Street Retail Auctions to bring properties back into use. See Cambridge example.	Policies are considered flexible enough to respond to any proposals, but promotion of these measures is outside the planning system.
C3 & C6	More protection for cultural, social and leisure activities	Draft Policies C3 and C5 do not adequately protect cultural, social and leisure activities and culture because they do not take into account that the people and communities are starved of access to facilities when community centres and venues are closed down for long	Significant redevelopment of facilities may take some time, and too many requirements about temporary reprocurement may act to stifle opportunities for redevelopment.

Draft policy	Topic	Summary of comments	Response
		<p>periods, years in some recent cases for redevelopment to take place. They appear to have the intention of preserving community and culture by specifying that a space has to be retained or a suitable local equivalent has to be provided by the applicant. The wording is much like the existing policies in the 2036 Plan under which the above examples occurred. However, a newly built or appointed facility opened years after closure of the original means that the culture and community will either have moved on or just died.</p>	

### Statutory Consultee Comments – Draft Policy C3

Oxfordshire County Council

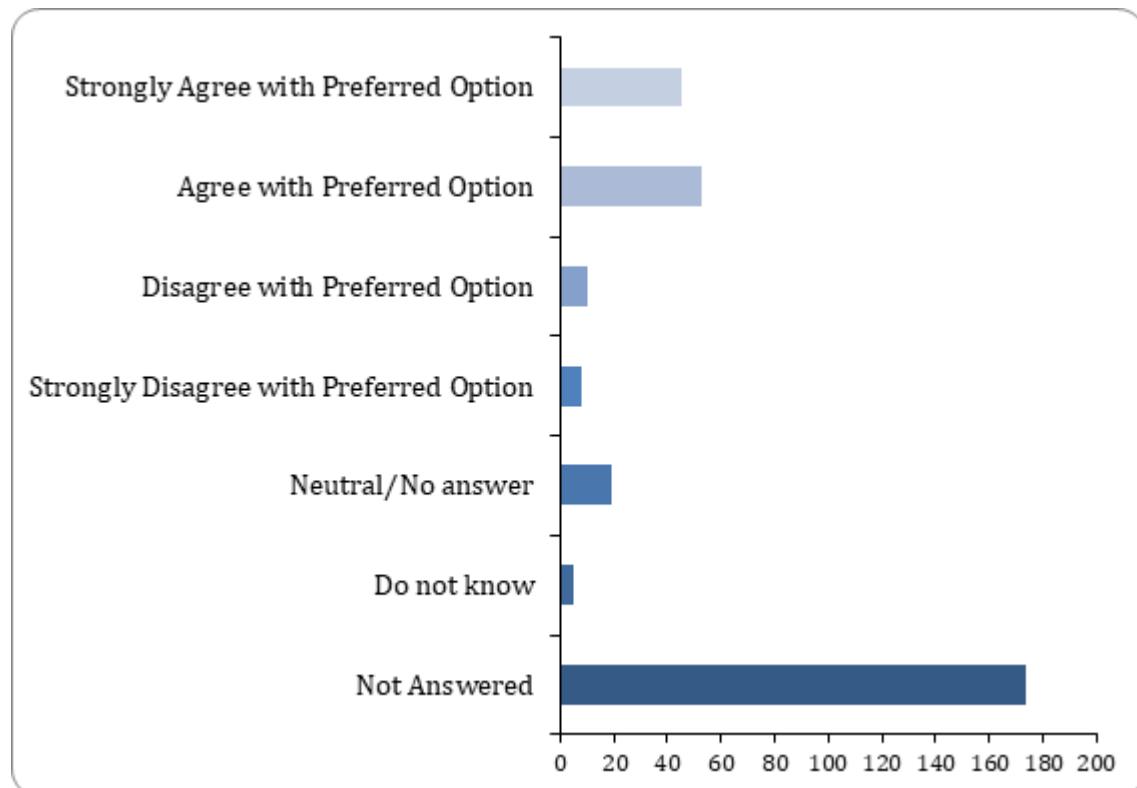
Draft Policy	Summary of comment	Response	Outcome
Policy C3 Local Community Facilities	<p><b>County Council Property and Estates Team</b></p> <p>Oxfordshire County Council Property and Estates Team overall support this draft policy; however, it is considered that the type of evidence that would need to be submitted with a planning application for a development that would result in the loss of a community facility should be specified either in the supporting or policy text to improve clarity.</p>	<p>Policy C3 clearly sets out that the loss of community facilities will not be supported unless one of the three bullet point criteria are met.</p>	No Action Required

<b>Draft Policy</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
	<p>It would be helpful to clarify the type of evidence that would be required to justify such development proposals, as OCC owns several community facilities and a need may arise in the future for their alteration which will be for the public benefit of the local community.</p>	<p>Evidence would need to be provided that one of the three bullet point criteria has been met.</p>	<p>No Action Required</p>

## All Public Responses – Draft Policy C4

Please tell us what you think about policy option set 013e (draft policy C4): Protection and Alteration of Learning and Non-residential Institutions.

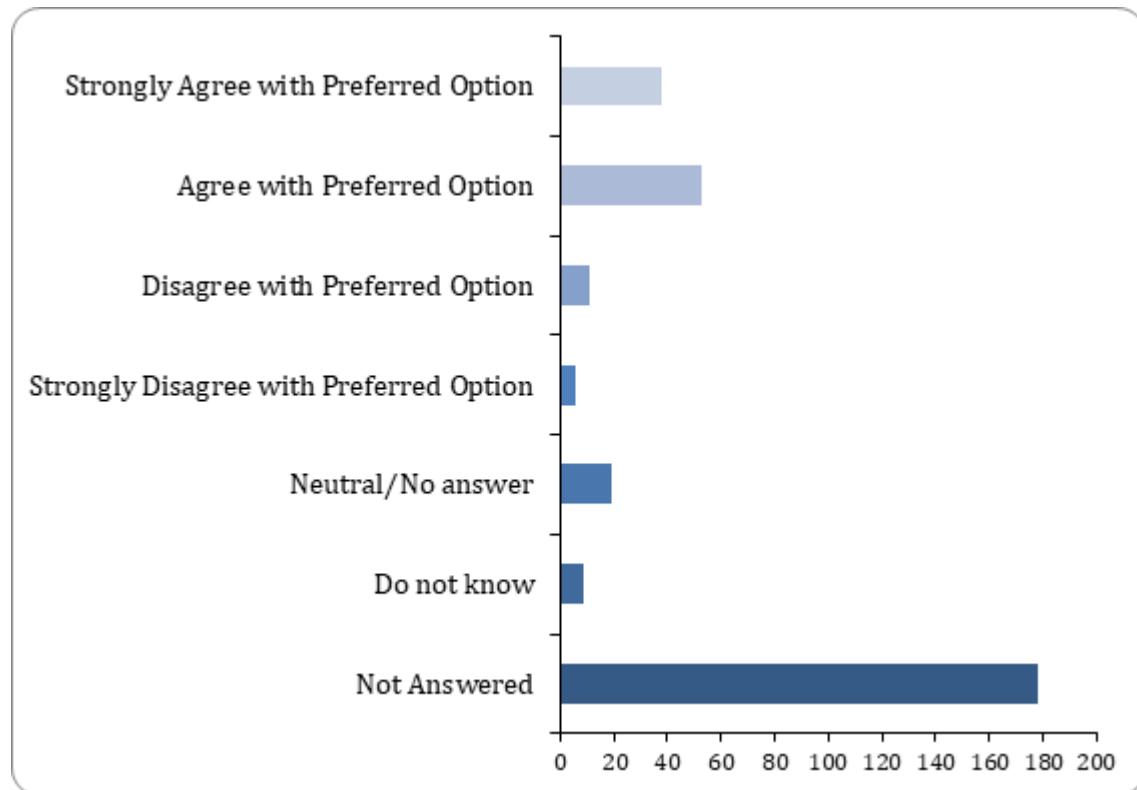
There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	10	3.18%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	19	6.05%
Do not know	5	1.59%
Not Answered	174	55.41%

Please tell us what you think about policy option set 013f (draft policy C4): Protection and Alteration of Learning and Non-residential Institutions.

There were 136 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	38	12.10%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	19	6.05%
Do not know	9	2.87%
Not Answered	178	56.69%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
C4	Support	Support in principle	The support is welcomed.
C4	Should allow loss/should not have a policy protection.	Allow loss for homes  Do not protect at all- market forces and national policy cover.  Policy over-reaching  Ossifies valuable plots even when it could be better used.	The use class F1 includes schools, museums and libraries, which are important pieces of infrastructure to support communities, needed in the city, which should have some protection. However, the policy is flexible enough, to allow responses to a change in need.
C4	Should be more restrictive of these use	No more private schools. No more expansion of education sector.  Issues such as traffic stress. No capacity for more education institutions. Transport impacts need to be better managed.	The planning system is unable to treat private schools any differently to state schools.  Accessibility by sustainable travel is key part of the assessment criteria in the policy.
C4	Policy should not exclude universities	Policy confirms “This does not apply to academic institutions exclusively for 18+ students such as the University of Oxford and Oxford Brookes University.” This statement is objected to, with the basis of this being that there is no alternative policy that is considered to be comparable and allowing objective assessment of the need for new facilities. If the policy is to be brought	The universities meet different needs and have different considerations, and the policy is not intended to apply to them.  The main impact of the universities is student accommodation, which is

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		forward, the caveat should be removed, or an alternative University development specific policy should be proposed.	managed by policies in the housing chapter.
C4	Open to manipulation	Institutions may use the policy to get a footprint in the city that can then be repurposed for financial gain.	This potential occurrence can't dictate whether or how new learning facilities should be allowed.
C4	Objection	<p>OCC has, at every single local plan, attempted to block any rivals to Oxford University or other institutions trading on the Oxford moniker.</p> <p>Modification Requested: Remove the phrase "<i>the proposal will meet local needs or an existing deficiency in provision or access</i>" - this is a a "backdoor method" of banning new institutions</p> <p>Many of the requirements of this policy are addressed in other policies such as traffic and environmental impacts.</p>	<p>There is a third university with a presence in Oxford- the University of West London has a campus at Ruskin College, Dunstan Road. It is important new facilities meet local needs.</p>

## Statutory Consultee Comments – Draft Policy C4

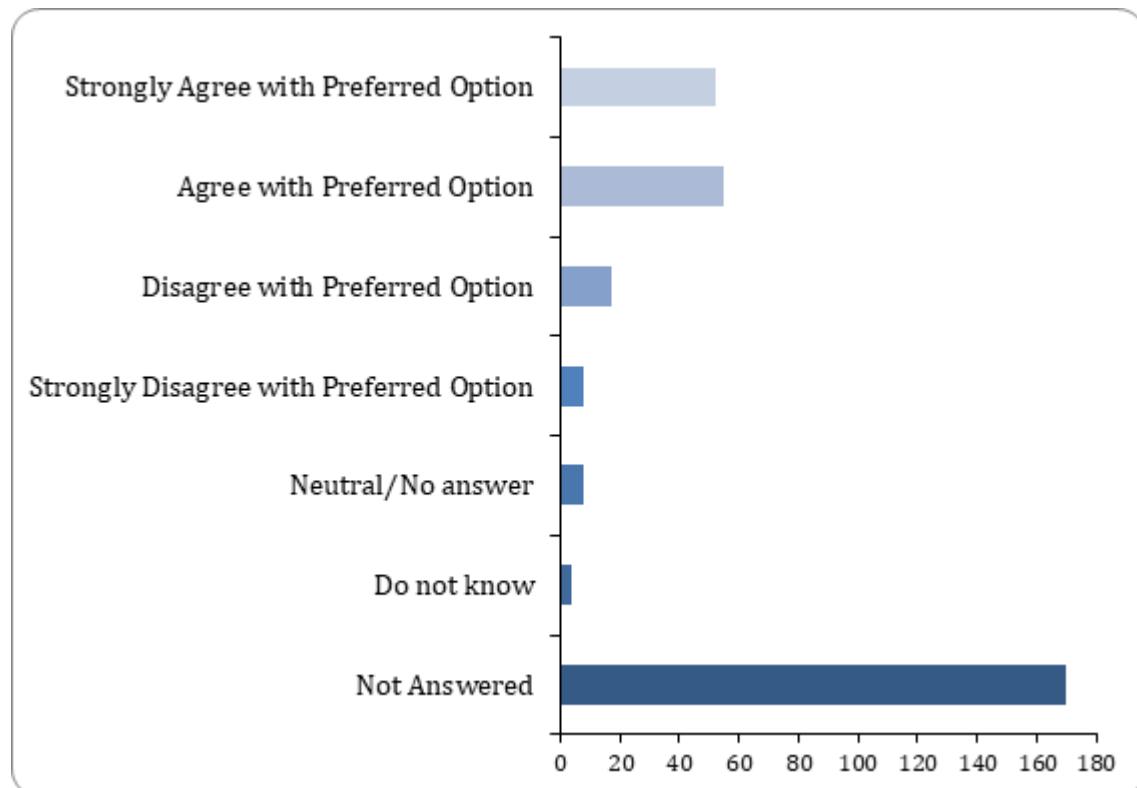
Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome
Policy C4 Learning and non-residential institutions	<p><b>County Council Property and Estates Team</b></p> <p>Oxfordshire County Council Property and Estates Team supports this draft policy and would appreciate if some supporting text were to be added that would explain the level of information needed to comply with this draft policy when considering the cases where joint user and shared user agreements are not possible.</p> <p><b>Education Team</b></p> <p>Paragraph 7.9 makes reference to 'Local Education Authority' which is no longer the used definition. Please update to refer to 'Local Authority with responsibility for Education' within the plan (see also Page 188).</p>	<p>The policy does not set out requirements for the granting of planning permission based on securing community/ joint use agreements. Where opportunities exist, they should be taken.</p> <p>Noted. We will make sure the correct reference is used.</p>	<p>No Action Required</p> <p>Oxford City Action: Ensure correct terminology is used.</p>

## All Public Responses – Draft Policy C5

Please tell us what you think about policy option set 013g (draft policy C5): Protecting Cultural, Social and Visitor Attractions.

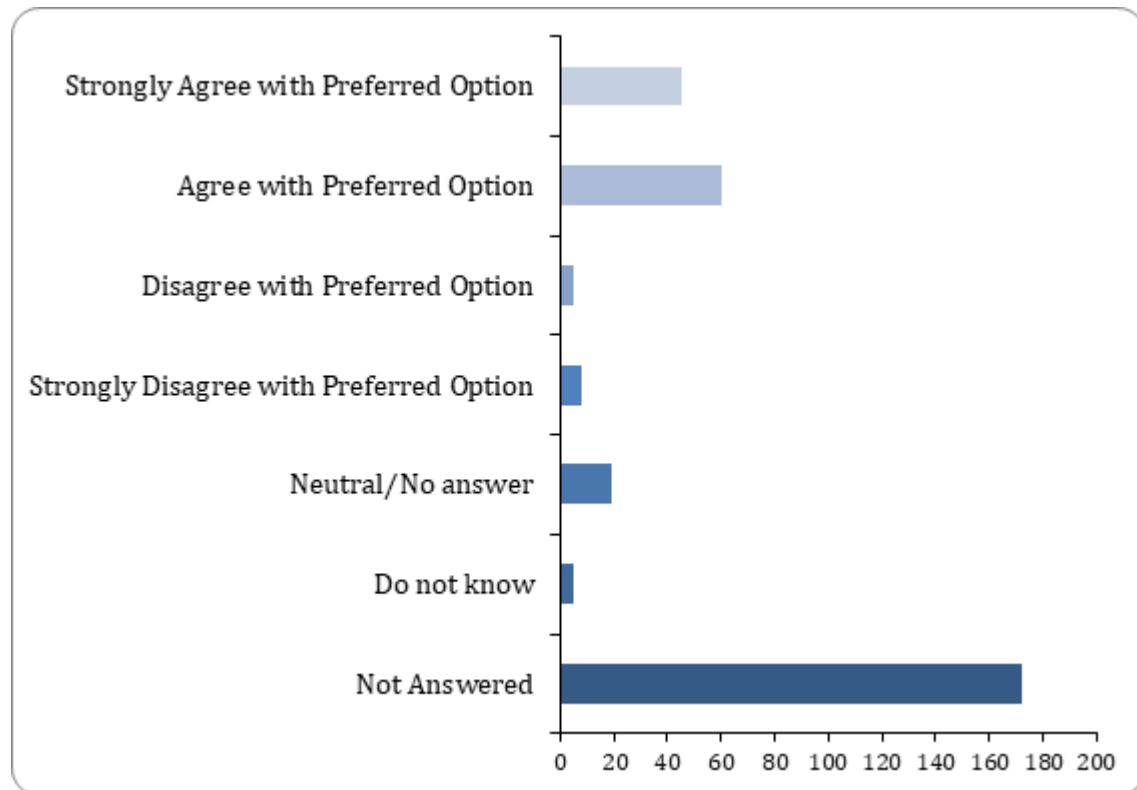
There were 144 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Preferred Option</b>	52	16.56%
<b>Agree with Preferred Option</b>	55	17.52%
<b>Disagree with Preferred Option</b>	17	5.41%
<b>Strongly Disagree with Preferred Option</b>	8	2.55%
<b>Neutral/No answer</b>	8	2.55%
<b>Do not know</b>	4	1.27%
<b>Not Answered</b>	170	54.14%

Please tell us what you think about policy option set 013h (draft policy C5): Provision of New Cultural, Social and Visitor Attractions.

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	60	19.11%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	19	6.05%
Do not know	5	1.59%
Not Answered	172	54.78%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
C5	Support	General support- good to preserve facilities and allow new.	The support is welcomed.
C5	Alternative options	Preference for alternative option 1/alternative option 2- more flexible/pragmatic, leave to the market, preferred option prevents dynamic change. Leisure tastes change and business models shift. Should not freeze every cinema, museum, etc.	The policy is implicitly clear that facilities do not have to be protected in exactly the same use within the general category, but addition has been made to the policy to make this clear. So a cinema does not necessarily need to remain as a cinema if alternative kinds of facilities would meet needs. This does give sufficient flexibility.
C5	Heritage	Historic use may be important to character.	Policy HD2, relating to listed buildings, is clear that the use of the listed building may be part of its significance.
C5	Pubs	Suggest use of CAMRA's Public House Viability Test, to ensure pubs are not deliberately run down so they can be redeveloped into more profitable uses.	Marketing evidence is required, with details set out in Appendix 7.1.
C5	Implementation	Implementation is key. Policies are too woolly. Need to make sure meet range of needs, including young people. Should ensure these facilities are not on greenfield sites. Should not limit things	The vast majority of greenfield spaces in the city are protected by other policies. The conversion of a

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		happening like a famous person's house becoming a museum after they die (or similar)	house (for example) to a museum is not ruled out by the policy, but justification and mitigation of impacts would be required, which is considered to be the right approach.
C5	Flexibility should apply. Supporting text suggestion	<p>It should be made evident in the policy that flexibility should apply with regard to the application of this policy against wider plan policies to enable development to be delivered to meet the ambitions of the Local Plan and in particular with reference to the Nuffield Sites. It is suggested that supporting text is incorporated which supports a flexible approach toward protection and retention of cultural venues where site allocations are supported for comprehensive mixed use redevelopment, as well as an additional bullet point included in the policy itself regarding the list of circumstances where the loss of cultural venues is supported. this additional bullet point could be incorporated/read as follows:</p> <ul style="list-style-type: none"> <li>• Or forms part of comprehensive, mixed use development scheme.</li> </ul>	There is not a need to make an exception to the policy for allocated development sites, as the policy itself allows sufficient flexibility.

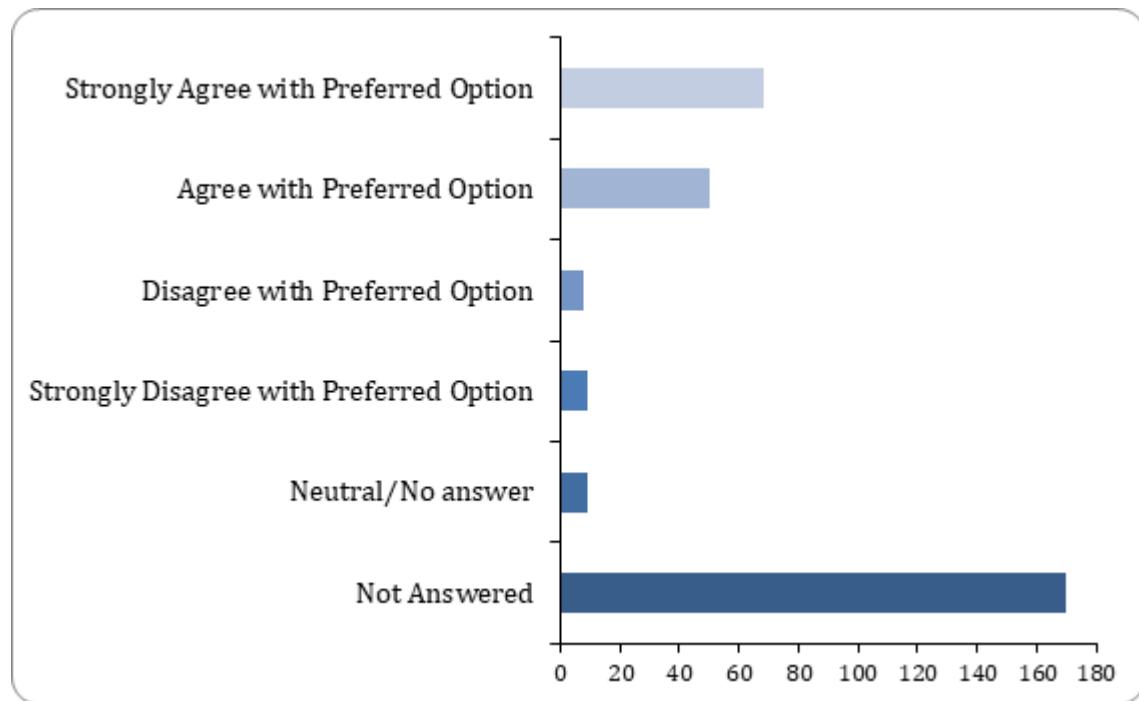
## Statutory Consultee Comments – Draft Policy C5

There were no statutory consultee comments.

## All Public Responses – Draft Policy C6

Please tell us what you think about policy option set 012a (draft policy C6): Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans

There were 144 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	68	21.66%
Agree with Preferred Option	50	15.92%
Disagree with Preferred Option	8	2.55%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	9	2.87%
Do not know	0	0.00%
Not Answered	170	54.14%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
C6	EV parking should be prioritised over cycle parking	The idea of assessing travel and transport is good but current plans of restricting cars and parking bays is bad. Oxford should be planning for the future by providing an infrastructure for electric cars and independent transport with parking areas built under all new buildings with charging stations rather than letting developers off by simply providing an inexpensive bike rack.	The Oxfordshire Electric Vehicle Infrastructure Strategy sets out the policies and plans to realise the County, City and District Councils vision for EV charging in Oxfordshire. The design and location of any EV charging infrastructure should consider and avoid negatively impacting on street scene in line with the principles of high quality design and the supporting design checklist.
C6	No transport/travel policies	Do not include a policy requiring transport assessments/statements, travel plans, construction management plans or service and delivery plans.	Noted.
C6	Traffic – private school drop offs	Require all private schools within the city to have a transport plan for students that includes assessment of their impact and their steps taken to provide mass transport e.g. buses and prevent single occupancy cars from dropping off. The traffic vanishes from Oxford during private school holidays - address	The City Council will continue to work with the County Council to identify potential solutions to conflicts between different road users in the city centre, with the aim of enhancing public realm, whilst also allowing good

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		this and we will have much better traffic flows in oxford termtime too.	accessibility by bus. However, the details of this work, and implementation of schemes, will be led by the County Council as Highways Authority and are outside the realm of the Local Plan.
C6	Better public transport	Public transport needs to be frequent, affordable and accessible. Subsidies may be needed to fully achieve this Council needs to work closely with the county and bus companies to achieve this.	Noted. A key aim of the City Council and of the County Council as Highways Authority is to promote a shift to sustainable modes of travel.
C6	A40 congestion – impact of Oxford North	I look forward to what you are going to do about the impact of the Oxford North Development on traffic congestion on A40 area.	The link road is already under construction, as part of the Oxford North planning permission.
C6	Policy to only include locally specific transport mitigation requirements	BMW support alternative option 1. Planning policy should be distinct from the validation requirements. The local validation checklist should set out when a Transport Assessment, Travel Plan and/or Servicing and Delivery Plan is needed, and policy should only include the locally specific transport mitigation requirements that are not previously covered in national policy.	Appendix 7.2 outlines when an assessment is likely to be required, as well as potential mitigation measures.

Draft policy	Topic	Summary of comments	Response
C6	Construction Management Plans should be required for all developments	<p>Developers of large sites should be required to liaise with other developers within a 1km range of their site and work together to ensure CMPs have minimum impact on local residents. Construction Management Plans should be required not just where large amounts of construction traffic will be generated, but also for developments where smaller amount of construction traffic may cause significant disruption to the surrounding area (e.g. on small residential roads where access to the site may be very limited).</p>	<p>The policy (as drafted) requires Construction Management Plans (CMP) to be submitted where the proposed development will generate significant amounts of movement. The requirement for a CMP can also be conditioned as part of any planning permission if appropriate and necessary.</p>
C6	Supportive	<p>Cyclox support the proposed policy on Transport Assessments, Travel Plans, and Service and Delivery Plans, and align with the Coalition for Healthy Streets and Active Travel (CoHSAT)'s response. We highlight the poor condition of Oxford's pavements, which are often uneven, obstructed, and difficult to navigate for wheelchair users, people with buggies, and those with mobility issues. To address this, policies should require pavements to remain level across driveways - avoiding the current car-centric design - and mandate the use of Dutch Entry Kerbs, now adopted as Oxfordshire County Council policy. Developers and homeowners undertaking renovations should be required to implement these standards.</p>	<p>Appendix 1.1 of the draft Local Plan sets out a design checklist that development proposals are expected to consider.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
C6	Support but policy could go further to reflect NPPF	<p>It is considered that this policy is sound with regard to the promotion of sustainable/active modes of travel, and the documentation that is required to support an application.</p> <p>The Reg 19 reps submitted by CBRE in Jan 2024 expressed concern with parts a) and b) of this policy. However, it is noted that the Local Plan 2042 reg 18 document now refers to 'no unacceptable impact on highway safety', rather than 'no impact on highway safety'. This is welcomed. It is also welcomed that the wording of part (b) has been updated to refer to 'no severe residual cumulative impact on the road network'.</p> <p>This wording could still go further to reflect the wording in the updated NPPF 2024, para.116, which also refers to mitigation and all reasonable future scenarios. It states: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios". We request this is reviewed and incorporated in the next draft version of the Plan.</p>	<p>The current draft wording of additional policies covers these point. Draft policy C8 requires Transport Assessments to demonstrate that there will not be unacceptable impacts on the transport network. Draft policy C1 states "planning permission will only be granted where...impacts on the road network can be mitigated".</p>
C6	Support with suggested amendments	We strongly support the proposed policy for Transport Assessments, Travel Plans and Service and Delivery Plans.	Minor amendment.

Draft policy	Topic	Summary of comments	Response
		<ul style="list-style-type: none"> <li>o Travel Assessments and Travel Plans should recognise that 32% of households in Oxford do not have access to a car. 92% of adults are able to cycle and about 60% of adults in Oxford cycled in the last year. Over 90% of Oxford adults walked (or equivalent) at least ten minutes in the last year. (Sources: Census 2021, Cycling UK, Sport England Active Lives).</li> <li>o In addition to the Street Design Guide, Policy C6 should refer to any further OCC or best practice guidance, such as Active Travel England planning guidance (<a href="https://www.activetravelengland.gov.uk/planning-active-places">https://www.activetravelengland.gov.uk/planning-active-places</a>) and the use of Dutch Entry Kerbs to keep pavements flat (<a href="https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transportpolicies-and-plans/hsd-1100-115_p01_series_1100_-_dutch_entry_kerb.pdf">https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transportpolicies-and-plans/hsd-1100-115_p01_series_1100_-_dutch_entry_kerb.pdf</a>)</li> <li>o Appendices 7.2 and 7.3 need an addition for non-residential institutions to include for example libraries, museums and places of worship.</li> <li>o We strongly support the inclusion of CLOCS</li> </ul>	
C6	Objection	<p>A typical bureaucratic view of the world, plan=delivered.</p> <p>Modification requested:</p>	<p>Policy is about ensuring that any traffic impacts are appropriately addressed and have been drafted to align with the wording in NPPF.</p>

Draft policy	Topic	Summary of comments	Response
		<p>Paragraph b) what does “<i>...residual ... impact</i>” mean?</p> <p>Paragraph c) the phrase “<i>and within neighbouring areas</i>” is ineffective. It is outside of the developer’s control.</p> <p>The policy is ineffective, as the policy does not actually result in any reductions. It implies that an increase in traffic is acceptable (which it is not as roads are already 100% full).</p> <p>The policy is also ineffective as it muddles planning with delivery of the plan objectives. The policy must state what must be done, rather than what should be planned for.</p> <p>The policy is Ineffective as it states, “<i>is likely to</i>”. This phrase is meaningless and only applies to the City Centre AQMA not the whole city.</p>	<p>The draft policy wording does not make any direct reference to the AQMA. The whole of the city was declared an AQMA in 2010 so the comment about the City Centre is not considered to be appropriate.</p>

## Statutory Consultee Comments – Draft Policy C6

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome
Policy C6 TAs, Travel Plans and Service Delivery Plans	<p><b>Transport Strategy</b></p> <p>Paragraph 7.11, page 160 - It would be positive to add to 7.11 a reference to improving health outcomes along with the other outcomes mentioned here.</p> <p>Key things to consider when drafting this policy – recommendation for the bullets in this section below:</p> <p>We suggest this also includes reference to the County's Freight Strategy, future OxRail 2040: Plan for Rail and future Street Design Code. It is also worth recognising the County are working on delivering an integrated transport policy which will be incorporated into LTCP, this will build upon the Oxfordshire Metro Concept.</p> <p>We recommend that C6 incorporates Vision Led Transport Planning as a requirement to ensure Oxford</p>	<p>Policy HD10: HIA already focuses on Health outcomes and requires a Health Impact Assessment.</p> <p>We can only include references to published/ adopted documents. Once these are published and available in their final “adopted” form, we can consider the inclusion of any costed infrastructure projects within our IDP.</p>	<p>No Action Required</p> <p>Oxford City Action: Watching brief for publication of county guidance/ strategies etc.</p>

Draft Policy	Summary of comment	Response	Outcome
	<p>City has the highest quality developments, showing how developers have used Vision Led Transport Planning to achieve sustainable transport infrastructure.</p> <p>It would be helpful in Draft Policy C6 if it also references how this policy will support LTCP policy to remove 1 in 4 car trips by 2030 and 1 in 3 by 2040 and reduce vehicle mileage. Travel Plans and TA's should actively show how they will be supporting this policy, this will also support the monitoring of Travel Plans.</p> <p>Within Draft Policy C6, outcome h) including e-bike/e-cargo bike charging would support the growth of e-bikes and e-cargo bikes.</p> <p>Travel Plans should incentive sustainable travel and support the delivery of cycle training for children, adults and families to support positive travel choices and provide health benefits to local communities.</p>	<p>We can consider the inclusion of the phrase Vision Led Transport Planning within the policy.</p> <p>The LTCP is the statutory transport plan for Oxfordshire. As such, no need to duplicate its content. Especially as this may be subject to change/ review when the next iteration is delivered.</p> <p>The plan already contains a policy on electric vehicle charging.</p> <p>Noted.</p>	<p>Consider including the phrase 'vision-led transport planning'</p> <p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p>

Draft Policy	Summary of comment	Response	Outcome
	<p><b>Place Planning and TDM teams (Central)</b></p> <p>We fully support the requirement for transport assessments to assess the multi-modal impacts of development proposals. The County Council's LTCP includes a transport user hierarchy to ensure future schemes consider walking, cycling, public and shared transport before the private car. It is important that development proposals also consider development impacts and any mitigation in this order too.</p> <p>We note this "The requirements for the transport assessment and travel plans are set out in Oxfordshire County Council's document Implementing Decide and Provide in Transport Assessments." Whilst this is helpful, it doesn't include this text in the policy wording itself. We think it would be incredibly helpful if specific reference to the County's Implementing Decide and Provide was included and worded as follows:</p> <p><i>"All major development proposals must demonstrate that the methodology in Oxfordshire County Council's Implementing Decide and Provide: Requirements for Transport Assessments document has been used to</i></p>	<p>Noted.</p> <p>We do not consider that the inclusion of adopted county council policy within our Local Plan is necessary.</p>	<p>No Action Required</p> <p>No Action Required</p>

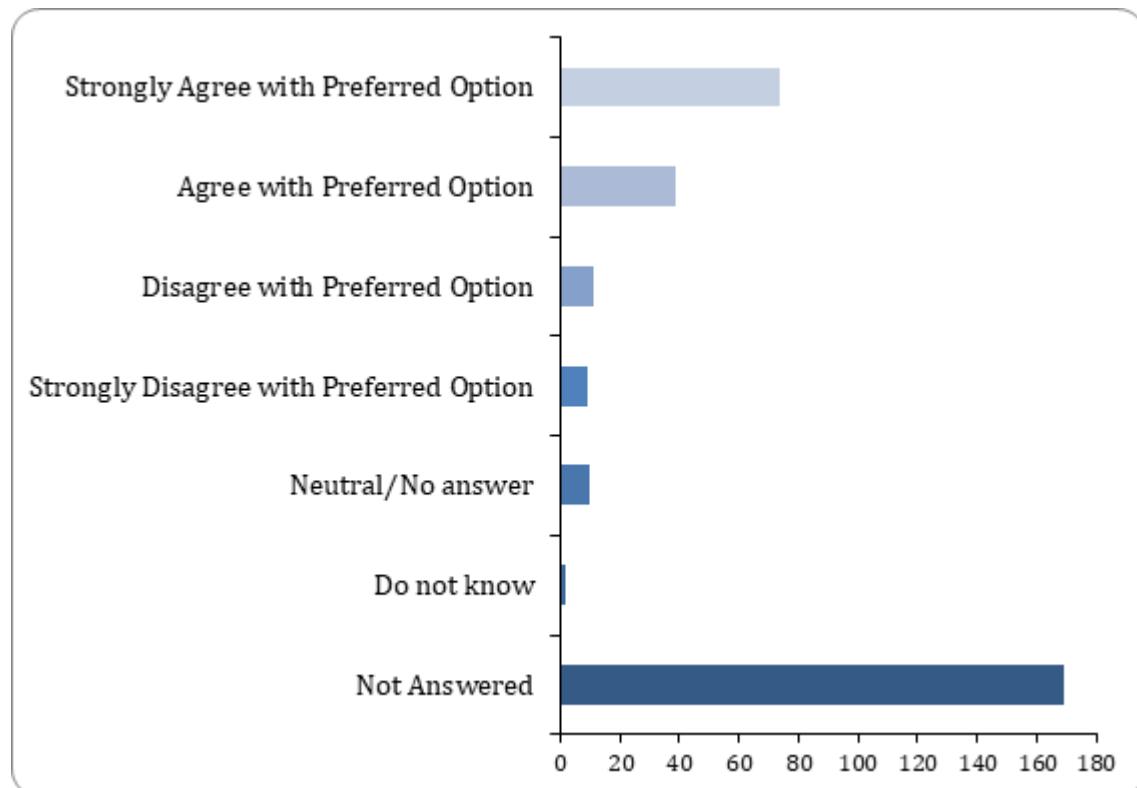
Draft Policy	Summary of comment	Response	Outcome
	<p><i>assess the need for infrastructure and provision of transport services.</i>"</p> <p>The latest version of the NPPF published in December 2024, includes the new requirement for development proposals to follow a vision-led approach to transport planning. This is referenced in paragraphs 109 and 115 and in paragraph 118 (p.33), which states:</p> <p><i>"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored."</i></p> <p>Further to this, the glossary at Annex 2 (p.80) of the NPPF describes a vision-led approach as:</p> <p><i>"...an approach to transport planning based on setting outcomes for a development based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to</i></p>	<p>We can consider the inclusion of the phrase 'vision-led transport statement/ assessment/ plan' in our Reg. 19 plan.</p>	<p>Oxford City Action: consider inclusion of text relating to 'vision-led transport planning'</p>

Draft Policy	Summary of comment	Response	Outcome
	<p><i>provide capacity (often referred to as 'predict and provide')."</i></p> <p>When these changes to the NPPF were initially proposed it was stated in the supporting text for the accompanying consultation that (Chapter 8, paragraph 7, MHCLG), "To support the implementation of this updated policy, we will publish updated guidance alongside the policy coming into effect." At the time of writing, this guidance remains forthcoming.</p> <p>Thus, in the context of this description of the vision-led approach and in lieu of the updated guidance, the Implementing Decide &amp; Provide document should be seen as the methodology that development proposals within Oxfordshire must follow in order to meet the requirement set out in paragraph 118 of the NPPF. However, it is expected that, once the updated guidance is made available, the County's Implementing Decide &amp; Provide will be complementary to the national guidance and will remain necessary in setting out local requirements to ensure that a vision-led approach to transport planning has been followed.</p>	Noted.	No Action Required

## All Public Responses – Draft Policy C7

Please tell us what you think about policy option set 012b (draft policy C7): Bicycle Parking Design Standards.

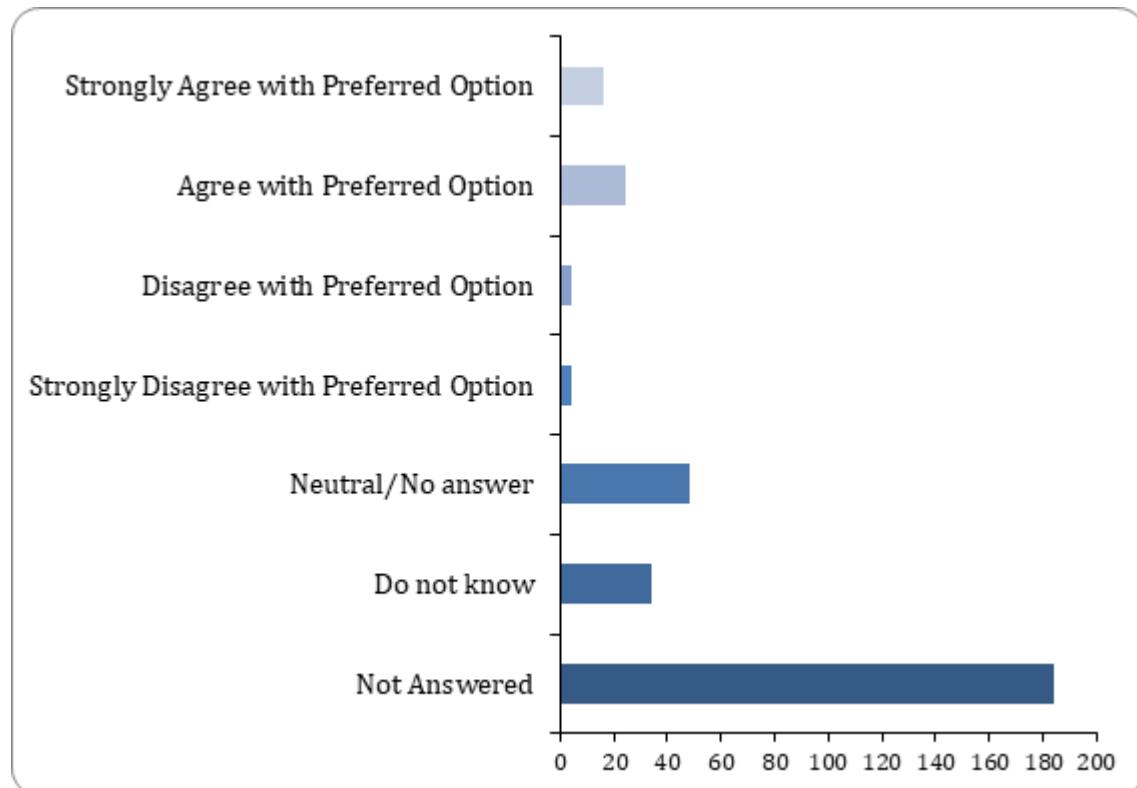
There were 145 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Preferred Option</b>	74	23.57%
<b>Agree with Preferred Option</b>	39	12.42%
<b>Disagree with Preferred Option</b>	11	3.50%
<b>Strongly Disagree with Preferred Option</b>	9	2.87%
<b>Neutral/No answer</b>	10	3.18%
<b>Do not know</b>	2	0.64%
<b>Not Answered</b>	169	53.82%

Please tell us what you think about policy option set 012c (draft policy C7): Motorcycle and Powered Two Wheelers Parking Design Standards.

There were 130 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	16	5.10%
Agree with Preferred Option	24	7.64%
Disagree with Preferred Option	4	1.27%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	48	15.29%
Do not know	34	10.83%
Not Answered	184	58.60%

Draft policy	Topic	Summary of comments	Response
C7		Provide a more thorough definition of "secure", that unambiguously excludes handles removable by anyone with a screwdriver, or the rows of useless ground-mounted hoops around the Kassam stadium.	Examples of good practice for cycle storage are provided within the Car and Bicycle Parking TAN published in March 2022.
C7		Very strongly agree - good bike parking and storage, across a range of bike types, is critical to encouraging an active travelling city.	Noted.
C7		Residential and Non residential schemes should provide equipment and facilities for community owned e:bikes for hire. More stringent rules needed on the location of e-bikes.	The Design Checklist set out in appendix 1.1 requires sufficient pavement space for different users needs. Appendix 7.4 requires bicycle parking to be future proofed to ensure that the infrastructure to support the charging of electric bicycles is supported.
C7		Draft Policy C7 already insists that every scheme hit Oxfordshire County Council's minimum cycle-parking standards—two spaces per bedroom for conventional housing, one per study bedroom for students, plus extra cargo-bike bays, e-bike charging points, showers and lockers in most workplaces . Pushing "higher levels" on top of those generous baselines will consume valuable ground-floor footage, add capital cost and, on tight brownfield	Policy aligns with Oxfordshire County Council's Parking Standards for New Developments. A key aim of the City Council and of the County Council as Highways

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		plots, force a trade-off with additional homes or lab space. Developers are best placed to judge precisely how many long-stay versus short-stay racks, cargo bays or charging sockets their occupants will actually use; market demand and Building Control already penalise schemes that skimp on storage. A principle-led policy—secure, convenient, level access, with flexibility for reduced provision where spare capacity exists (as the draft itself allows for student blocks) would keep Oxford cycle-friendly without turning the bike shed into another viability hurdle that slows supply across the city.	Authority is to promote a shift to sustainable modes of travel.
C7		Nice idea, but it goes a bit too far. Tricycles and trailers occupy a great deal more floor space than efficiently stacked pedal bikes.	A key aim of the City Council and of the County Council as Highways Authority is to promote a shift to sustainable modes of travel. The availability of various forms of bike parking is a key tool in achieving this aim.
C7		BMW support the inclusion of bicycle parking design standards, but recommend that the policy acknowledges the local circumstances of business and their operations and phrases the policy to “encourage” rather than “require” since the preferred design options may not always be achievable or necessary.	The targets only apply to new developments, and are considered appropriate in order to meet the City and County Council's key aim to promote a shift to sustainable modes of

Draft policy	Topic	Summary of comments	Response
			travel. In line with the County Council's Parking Standards for New Developments paragraph 1.2, "new developments will need to work collaboratively with Oxfordshire County Council to achieve these targets."
C7		Buses should be the priority over cycling. That's how most people should get around.	Noted.
C7		Indoor bike parking should not be provided indoors.	Noted.
C7	Supportive	Divinity Road Area Residents Association support this policy.	Noted.
C7	Support with suggested amendments	<ul style="list-style-type: none"> <li>o This policy should refer to 'Cycle Parking' not 'Bicycle Parking', as this is a more inclusive term.</li> <li>o The policy reference the guidance on cycle parking quality, inclusivity and security in LTN 1/20, Chapter 11 and the 'Appendix: Specific points from Cyclox update to Oxford City Council Technical Advice Note on cycle parking' below. All of these are important, as people must feel their cycles will be secure to buy and adopt cycling, particularly with more expensive e-cycles. For new developments, internal or hangar type storage should be the standard.</li> </ul>	Amendment proposed.

Draft policy	Topic	Summary of comments	Response
		<ul style="list-style-type: none"> <li>o Appendix 7.4 has an error in use type F1 where it assigns 'student' spaces to museums, libraries and places of worship. These should be covered by the 'Leisure centres, assembly halls, hospitals and healthcare' part of Table 11-1 in LTN 1/20 and have 1 space per 5 employees, plus the greater of 1 per 50m<sup>2</sup> or 1 per 30 seats/capacity. It should be possible to simplify Appendix 7.4 with reference to LTN 1/20 Table 11-1.</li> </ul>	
C7	Comment	<p>Policy reflects existing policy and importantly allows for lower parking standards where justified. This is important as the cycle parking standards can result in excessive provision, leading to inefficient use of land, a proliferation of unsightly cycle stands and adverse impact on heritage assets, particularly in the City Centre. The policy sets out a sensible and pragmatic approach to deal with this issue.</p>	Noted.

### Statutory Consultee Comments – Draft Policy C7

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome
Policy C7	<p><b>County Councillors</b></p> <p>Bicycle and Powered Two-</p> <p>We welcome reference to the County Council parking standards however we would like to request that the</p>	<p>As the city's cycle parking standards are required to support decision-</p>	No Action Required

Draft Policy	Summary of comments	Response	Outcome
wheelers Parking Design Standards	<p>wording of the policy is such that it can reflect that these standards will be reviewed on a regular basis. Therefore, we encourage the City Council to make reference to the County Council parking standards with an open wording, noting the need to refer to the County as the Highway Authority for the latest standards, instead of including them as an Appendix to the City Plan.</p> <p><b>Transport Strategy</b></p> <p>Paragraph 7.15 - we recommend a slight change in language to put greater emphasis on end of trip facilities for cycling. Suggested change to third bullet point:</p> <p><i>"As well as parking facilities, changing rooms, showers and locker facilities in places of work can be <u>are</u> important in enabling people to cycle."</i></p> <p>Incorporating the importance of lighting should be added. In the paragraph relating to bicycle parking, it should also include – bicycle parking should be well lit.</p>	<p>making, it is helpful for them to be included within an adopted Local Plan. While standards do change from time to time, we need to produce a new local plan every five years so would be able to quickly accommodate any changes to standards.</p> <p>While showers, parking facilities and changing rooms are important to some to enable them to cycle to work. They are not used by all and are not always available. As such “can be” is appropriate language in this context. Do not accept proposed amendment.</p> <p>This paragraph suggests cycle parking should be “well-lit” however the proposed amendment to the policy suggests it should be “inclusive”. We</p>	<p>No Action Required</p> <p>No Action Required</p>

Draft Policy	Summary of comments	Response	Outcome
	<p>This removes one of the barriers to access and will improve natural surveillance as well as incorporating bike maintenance stand. Within the policy C7 a slight addition to the wording of the 4th paragraph:</p> <p><i>"Bicycle parking should be well designed, <b>inclusive</b> and well-located, convenient, secure, covered (where possible enclosed) and provide level, unobstructed external access to the street."</i></p> <p>It is important to include children's bikes within this, they are often overlooked when developing bicycle parking, and to help enable families to cycle all barriers to access should be considered. Children's bikes are often too small to be locked to standard Sheffield stands as the top bar is too high. See suggestion to 5th paragraph of policy :</p> <p><i>"Bicycle parking should be designed to accommodate an appropriate amount of parking for the needs of disabled people, <b>children's bikes</b>, bicycle trailers and</i></p>	<p>do not consider that this suggested change reflects the preceding reasoning/ rationale. As such we do not accept it.</p> <p>In principle, we have no real objection to this amendment, however, are there any specific County Council design standards for Children's bikes that we can provide to developers? Are they publicly available? Are there any cost implications?</p>	<p>Oxford City Action: consider inclusion of phrase 'children's bikes' within the policy</p>

<b>Draft Policy</b>	<b>Summary of comments</b>	<b>Response</b>	<b>Outcome</b>
	<i>cargo bicycles, as well as facilities for electric charging infrastructure to charge batteries for E bikes."</i>		

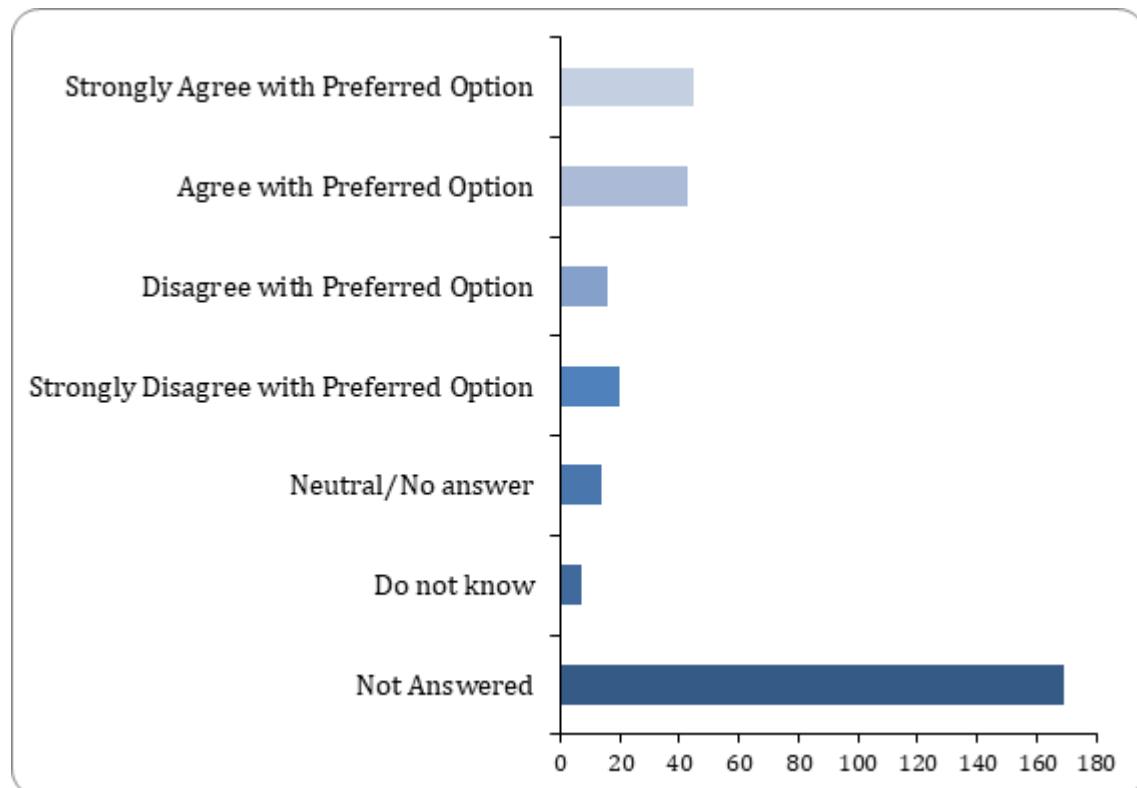
South Oxfordshire District Council and Vale of White Horse District Council

<b>Draft Policy</b>	<b>Summary of comments</b>	<b>Response</b>	<b>Outcome</b>
C7, C8, C9	<p>Numerical or survey style data would be beneficial to justify choices for any standards in these policies. The background paper needs to provide justifications for some of the transport policy choices and standards made in draft policies in the Plan.</p> <p>Your use of Census 2021 data for modal share or origin-destination, rather than the generally more reliable 2011 data, also needs justification.</p>	<p>The policy approaches will be explained and justified in background papers.</p> <p>The Census 2021 represents the most recent data, which it is appropriate to use.</p>	

## All Public Responses – Draft Policy C8

Please tell us what you think about policy option set 012d (draft policy C8): Motor Vehicle Parking Design Standards.

There were 145 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	43	13.69%
Disagree with Preferred Option	16	5.10%
Strongly Disagree with Preferred Option	20	6.37%
Neutral/No answer	14	4.46%
Do not know	7	2.23%
Not Answered	169	53.82%

Draft policy	Topic	Summary of comments	Response
C8	Not effective-detailed policy wording	<p>Policy is not effective as the word “scheme” is not defined (in particular for smaller developments such as end of garden development/site split or 2-3 houses). Also “frequency” is not defined by time (e.g. rush-hour versus 04:00 AM)</p> <p><i>will only be granted for residential schemes* that are low car:</i> The language is unclear. What does “only” mean in this context? (1) Homes would have only a ‘small number’ of shared spaces. What is meant by ‘small number’ is not specified. That should be specified as a percentage of the number of homes relying on these shared spaces.</p> <p>The phrase “<i>Seek a reduction</i>” is ineffective. Additional staff or residents will use a variety of transport modes some of which will result in an increase in traffic. A net reduction is therefore required to compensate this.</p> <p>Waffle that belongs in supporting text, a plan is not a goal.</p> <p>Low should not be used to mean ‘no’.</p>	<p>An amendment has been made to change ‘scheme’ to ‘development’, and the asterisk explains what this means. The word ‘only’ is considered to be clear.</p> <p>A small amendment has been made to remove the phrase ‘a small number’- this related to the listed types of spaces that would be allowed, but in that case it is agreed is unnecessary.</p> <p>In accessible locations, where there are existing spaces, a reduction will often be possible and expected.</p>
C8	Out of centre development	Draft Policy C8 should include a presumption against out-of-centre developments that would require other than operational and accessible parking. The evidence of the	Additional wording about parking has been added to Policy C1.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<p>retail study supports a 'strong stance' regarding out-of-centre development.</p> <p>Opposite view also given- that some retailers selling bulky items need to provide parking.</p>	
C8	Restricting residential parking is not the answer and creates issues.	<p>We believe the Policy is badly misconceived in its extreme emphasis on reducing car parking at residential developments. It ignores the obvious fact that car ownership is not solely driven by a determination to drive on congested Oxford roads. Improving public transport will lead to fewer cars.</p> <p>Public transport must be greatly improved first.</p> <p>Delivery vehicles generate as much, if not more, traffic.</p> <p>Some need a car- those looking after elderly, families with children.</p> <p>Residents could not be sure of having anywhere at all to park a car, and would be in constant conflict with neighbours.</p> <p>(2) Outside the deliberately 'low car' schemes, residents will be unable to entertain any visitor that arrives by car.</p>	<p>A key aim of the City Council and of the County Council as Highways Authority is to promote a shift to sustainable modes of travel. The availability of parking is a key tool in achieving this aim. It is important that sites are not isolated and the alternative travel options are available in order for this to be successful, which is why the policy has two options for residential developments.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<p>Stop the anti-car obsession.</p> <p>Priority should be green car, not low car.</p> <p>If there is low car, there must be facilities and connections or anti-social behaviour (e.g. Barton Park).</p>	
C8	HMO parking issues	<p>This policy needs to recognise the existing parking issues associated particularly with HMOs and proximity to district centres. HMO households may have multiple cars (making use of visitor as well as resident permits) and anti-social pavement parking is very common. The only answer is for both universities to restrict students from bringing cars into Oxford (with certain exceptions such as disability, need to travel to work placement etc.) as already happens in Cambridge. We appreciate that this goes beyond the Local Plan process but would like to see our concerns noted to highlight the issue and encourage wider action.</p>	<p>Comment noted. HMOs meet a wide range of housing needs and are not all occupied by students. Provision of parking is considered with HMOs, but car ownership cannot be controlled.</p>
C8	Issue with CPZs not existing over greenfield sites at time of application, and public transport	<p>For 'low car' status, an equivalent to the CPZ and the other criteria should be added for greenfield and brownfield sites as CPZs may not be in place yet. This should require low car status for any area likely to become well served by services and public transport, including through development plans. As such services are required by other policies, this should apply to all major</p>	<p>Additional wording has been added to the policy to clarify this, in response to this concern.</p>

Draft policy	Topic	Summary of comments	Response
	improvements not being in place.	developments. This loophole should be addressed by applying CPZ-equivalent rules to all development sites, and low-car schemes should be expected for all developments across the city.	
C8	Support for low car or no car	Think there will be a surprisingly low car or no car developments. Benefits for children being able to play and travel independently. Some support for completely car free developments. City needs radical reductions in car parking. All new office/lab employment space should only have disabled parking spaces.	The support is welcomed. It is noted that some consider the policy should go further. It is considered that the policy strikes the right balance.

## Statutory Consultation Comments – Draft Policy C8

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome
Policy C8 Motor Vehicle Parking Design Standards	<p><b>County Councillors</b></p> <p>We welcome reference to the County Council parking standards however we would like to request that the wording of the policy is such that it can reflect that these standards will be reviewed on a regular basis. Therefore, we encourage the City Council to make reference to the County Council parking standards with an open wording, noting the need to refer to the</p>	See comment for policy C7 above as same rationale/ principle apply.	No Action Required

Draft Policy	Summary of comments	Response	Outcome
	<p>County as the Highway Authority for the latest standards, instead of including them as an Appendix to the City Plan.</p> <p><b>Public Health</b></p> <p>This is the only policy which makes reference to 'active travel'. As we stated in our previous consultation response, we believe the Local Plan requires a separate policy dedicated to active travel.</p> <p><b>Transport Strategy</b></p> <p>Paragraph 7.16 – health benefits should be included along with others already stated within this paragraph.</p> <p><b>Place Planning and TDM teams (Central)</b></p>	<p>Disagree that the plan needs a policy dedicated to "active travel". All active travel schemes should be included in the IDP Delivery Schedule. If new additional infrastructure schemes are needed to support development proposed in the plan, these should be set out in publicly available/ approved documents in order for them to be included within the IDP.</p> <p>Noted.</p>	<p>No Action Required</p> <p>No Action Required</p>

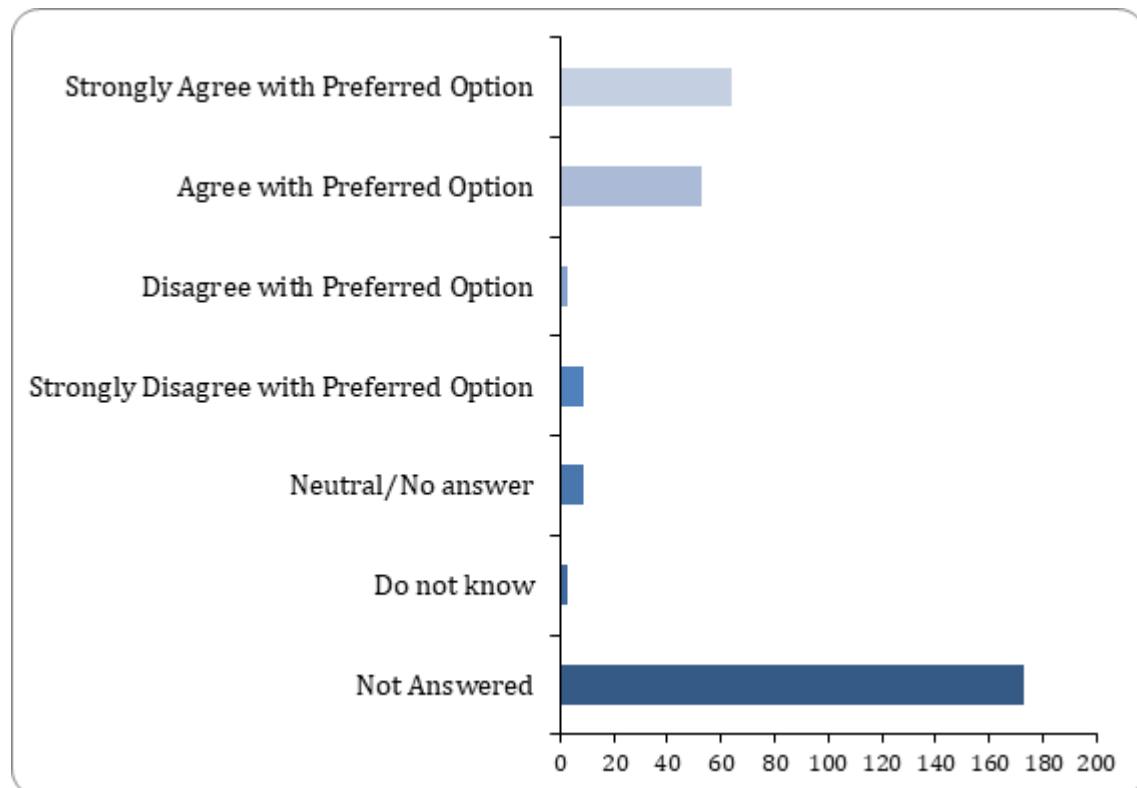
Draft Policy	Summary of comments	Response	Outcome
	<p>Some sites coming forward are not on land currently developed, so are not within an existing CPZ. Notwithstanding this, the site still might be suitable for low car as a future CPZ could be introduced and as the proposed site access is already in an existing CPZ, and the site already benefits from good public transport connectivity and is within an acceptable walking distance of a local supermarket or equivalent. Suggest modification to bullet point a) as follows:</p> <p><i>a) in Controlled Parking Zones (CPZs) or the site access is within an existing CPZ; and</i></p>	<p>We are aware of this issue on certain sites. However, it can be addressed through specific site allocation policy wording rather than an amendment to this policy.</p>	No Action Required
	<p>The text in the box refers to “TP” throughout but should this be “TA” i.e. transport assessment.</p>	<p>Disagree with proposed amendment to bullet point a). This issue would be better addressed through site specific policies.</p>	No Action Required
	<p>The current car parking policy for non-residential uses within LP 2036 (policy M3), in the case of the redevelopment of an existing or previously cleared</p>	<p>We will look into this issue and update as required.</p>	<p>Oxford City Action: Review and update as required.</p>
		<p>We have strengthened the policy to seek no additional car parking (except for blue badge/ servicing) and at</p>	No Action Required

Draft Policy	Summary of comments	Response	Outcome
	<p>site, was that “there should be no net increase in parking on the site from the previous level and the Council will seek a reduction where there is good accessibility to a range of facilities”. This requirement, in the case of the redevelopment of an existing or previously cleared site, appears to no longer remain with the level of car parking to be demonstrated through the TA. The County Council fully supports no net increase in car parking in the case of the redevelopment of an existing or previously cleared site and given these can often be in locations which are congested and sensitive to changes in traffic flow. We feel the existing policy should be retained.</p>	<p>accessible sites, we are now seeking a reduction.</p> <p>Any increases need to be justified through the TA/ TP process.</p> <p>We feel this covers a wide range of sites and that specific reference to “existing/ previously cleared sites” is not required.</p>	

## All Public Responses – Draft Policy C9

Please tell us what you think about policy option set 012e (draft policy C9): Electric Vehicle Charging.

There were 141 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Preferred Option</b>	64	20.38%
<b>Agree with Preferred Option</b>	53	16.88%
<b>Disagree with Preferred Option</b>	3	0.96%
<b>Strongly Disagree with Preferred Option</b>	9	2.87%
<b>Neutral/No answer</b>	9	2.87%
<b>Do not know</b>	3	0.96%
<b>Not Answered</b>	173	55.10%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
C9	Policy duplicates Building Regs	EV charging provision standards/ infrastructure already set nationally through Building Regulations. Is Draft Policy C9 necessary? If policy retained, support principle of enabling EV adoption. Agree that requiring a proportion of active charging points is reasonable. A minimum of 10% active provision is considered an appropriate and proportionate amount.	Draft policy C9 has been merged into Policy C8, Motor Vehicle Parking Design Standards. References to the amount of provision have been removed as these are covered by Building Regulations.
C9	Objection – blue badge/ car club requirements	Object to requirement that all new blue badge bays and all car club bays be fitted with live, ready-to-use EV charging infrastructure from the outset. Requirement not justified by evidence of user demand. Risks unintended consequences for usability/ safety and redundant infrastructure. Suggestion that these spaces should fall within the overall 10% requirement.	The provision of EV charging infrastructure is encouraged for blue badge/car club bays to help encourage take up of EV vehicles.
C9	Support for policy	General comments received in support of a policy: <ul style="list-style-type: none"> <li>• Essential for increasing uptake of EV's</li> <li>• Should be more than just disabled bays – the infrastructure should benefit everyone.</li> <li>• So few homes in the city have off street parking options, creating gullies across the pavements is necessary.</li> </ul>	The support is welcomed. It is noted that some consider the policy should go further. It is considered that the policy strikes the right balance.

Draft policy	Topic	Summary of comments	Response
		<ul style="list-style-type: none"> <li>• Should promote EV ownership rather than no car ownership.</li> <li>• Charging infrastructure must be flexible and widely available so that if necessary, motorists can park and charge their vehicle some distance from their own home.</li> </ul>	
C9	Developer provision	On future residential developments, infrastructure for on street charging for EVs should be provided and maintained by developer at no cost to residents.	The charging provisions are set out in Part S of the Building Regulations 2010.
C9	Support for alternate policy	Prefer Alternate Option C	The reasons for the preferred option are set out in policy options set 012e of background paper 012: Transport
C9	Resident parking	For existing residents, be sensible about suggestions for charging when parking is difficult or impossible near or outside their houses (i.e. in terraced housing with on-street parking).	EV charging infrastructure is required for residential and non-residential development in accordance with Part S of the Building Regulations 2010.
C9	Enforcement	How will on street charging work? Can you ensure that people move vehicles once charged?	This is beyond the remit of the local plan.
C9	Accessibility concern	You should mandate developments to adopt the British Standards Institution's PAS1899, accessible EV charging stations. EV charging is quite problematic for people with disabilities and PAS1899 has clear, valuable	The charging provisions are set out in Part S of the Building Regulations 2010. Oxfordshire County Council's Street Design Guide provides further guidance

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		recommendations.	on EV charging infrastructure for off plot parking.
C9	EV infrastructure design	EV infrastructure should be well designed and easily available, standards should be realistic.	Infrastructure for the charging of electric vehicles is addressed by Part S of the Building Regulations. This covers both residential and non-residential developments with specific levels of requirements set out for each use. Oxfordshire County Council's Street Design Guide provides further design guidance.
C9	Facilitate EV adoption	The policy does not go far enough to facilitate EV adoption by residents who lack off street parking. The Council needs a policy to resolve this, for which there are several options from Council funded pavement gulleys to lamppost charging to clusters of fast charging stations.	The policy seeks EV charging infrastructure provision in accordance with Part S of the Building Regulations 2010. Oxfordshire County Council's Street Design Guide provides further design guidance on EV charging infrastructure for off plot parking.
C9	Low car housing	Encourage more car free housing then EV charging will not be required. Charging points should be allocated to blue badge holders.	The Local Plan seeks to promote low car housing. Draft policy C9 has been merged into Policy C8 and seeks the provision of live EV charging infrastructure for new blue badge parking

Draft policy	Topic	Summary of comments	Response
			bays on new build residential and non-residential development.
C9	Support for new parking spaces to be “EV-ready” to lower costs	Mandating a charging point for every dedicated bay, and retro-engineering on-street spaces, adds cost and technical complexity just when the Plan is rightly pushing for low-car or car-free schemes. Developers respond by trimming unit numbers or hiking prices, while the market for EVs is still evolving and rapid-charging hubs are proliferating off-site. A lighter rule would simply require new parking spaces to be “EV-ready” (conduit and power capacity) and reserve full chargers only for Blue-Badge bays and pooled-car slots; private owners can then install hardware as demand materialises. This keeps upfront costs down, preserves streetscape flexibility, and lets Oxford meet both its decarbonisation and housing-delivery goals without over-specifying technology that may change faster than the Plan.	Draft policy C9 has been merged into Policy C8, Motor Vehicle Parking Design Standards. The policy includes reference to charging infrastructure being provided in accordance with Part S of the Building Regulations 2010. It also requires all new blue badge and car club parking bays to provide access to live EV charging infrastructure that is ready to use.
C9	EV charging for boats	Consider and discuss the implementation of EV charging for canal boats adjacent to new development with the Canal & River Trust where relevant as this may reduce potential conflict between boaters and residential property occupiers as a result of noise from generators/engines and smoke from stoves at a later date.	Comment noted. Additional text added to Policy H13 point 3 to include reference to EV charging for boats.

Draft policy	Topic	Summary of comments	Response
C9	Policy does not support move towards car-free developments	Hopefully you don't mean this 'on all new residential developments with a dedicated parking space' to say that every new home will need to have a car-parking space of their own?? That would seem to be contrary to the requirements proposed for car-free developments. Make sure it's clear what you mean!	Draft policy C9 has been merged into Policy C8, Motor Vehicle Parking Design Standards. The policy includes reference to charging infrastructure being provided in accordance with Part S of the Building Regulations 2010.
C9	Charging provisions	For new build residential development, the number of charge points to be: one 11kw point per 20 dwellings. For New build non-residential development, the number of charge points to be: one 11kw point per 20 car park spaces	The charging provisions are set out in Part S of the Building Regulations 2010.

## Statutory Consultee Responses – Draft Policy C9

Oxfordshire County Council

Draft policy	Summary of Comments	Response	Outcome
Policy C9 EV Charging	<b>Strategic Planning</b>  We note that this draft policy requires non-residential development to provide only 10% of EV charging infrastructure which is not in line with the County Council requirements of a 'minimum level of 25% for all parking spaces with ducting provided at all remaining spaces to 'future proof' such spaces to be upgraded in the future' as set out in Policy EVI 8 of	10% EV charging requirement aligns with the Building Regs.	Having reviewed the evidence, we have elected to align the % with the Building Regulations.

Draft policy	Summary of Comments	Response	Outcome
	<p>Oxfordshire's Electrical Vehicle Infrastructure Strategy (adopted March 2021 Oxfordshire Electric Vehicle Infrastructure Strategy) and Policy 29 of the adopted LTCP.</p> <p>As such, we would request the policy is updated to reflect the County Council requirements.</p>		

### All Public Responses to the Whole of Chapter 7

Draft policy	Topic	Summary of comments	Response
Chapter 7	Transport	<p>Recommendations of the Citizens Assembly on Transport:</p> <p>While I acknowledge that the City has no direct responsibility for travel, I'm sure the City council can influence County plans and actions. To this end I urge the City council to do more to create better mobility and inclusive transport by following up on many of the recommendations which came out of the recent Citizens Assembly on Transport, including the recommendation to support a rail/bus interchange, the recommendation to support a car-free city centre</p>	Comments noted.
Chapter 7	Community wealth-building	Community wealth-building is both redistribution of financial resources but also development of personal well-being and health in our communities. Plan needs stronger	Comment noted.

Draft policy	Topic	Summary of comments	Response
		<p>commitment to importance of social infrastructure and the foundational economy. Any new development should serve &amp; benefit local residents primarily. Also see report on Community Wealth Building across Oxfordshire <a href="https://www.oiep.org.uk/big-conversations---oxfordshire-a-county-of-community-wealth-building">https://www.oiep.org.uk/big-conversations---oxfordshire-a-county-of-community-wealth-building</a></p>	
Chapter 7	Omission policy: community-led stewardship	<p>Community First notes policy expectation with regard 'to the appropriate maintenance/management plans [being] organised as part of the design/construction process' in policy G2. Yet argues the Plan could be strengthened by explicitly supporting community-led stewardship. This involves working with, supporting, and releasing the skills, experiences and energy of citizens and inspiring projects that reflect what local people want and need. For instance, green space management plans, nature recovery and biodiversity initiatives, volunteering strategies, local food initiatives, links to schools and business, skills development, cultural and historical celebrations, and climate action.</p> <p>The cross-cutting nature of stewardship lends itself to being a new standalone policy, most obviously in Chapter 7.</p>	<p>Agreed these projects sound inspiring. These appear to be largely things that can't be actioned by the Planning system, and would take place outside of it. The Stewardship Strategy does not seem to be something that could justifiably be required or expected to be implemented, although many of the intended function of it such as maintenance would be covered by a Planning Condition (but the details of how that is managed are not matters for the Planning System).</p>