

# Chapter 8 – Infrastructure, Areas of Focus, and Site Allocations

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## Headlines for Chapter 8:

### **Infrastructure**

- Consensus that infrastructure improvements should occur before planned development, not after
- Need for the Infrastructure Delivery Plan to adequately mitigate the impacts of planned development
- Concern over increases in traffic congestion
- Lack of 5G coverage in Oxford

### **Areas of Focus**

- General support for overarching, spatial policies

### **Site Allocations**

- Several site allocations must include reprocision of play and sports areas, entertainment venues, public parking and community centres
- Encouragement to continue to prioritise brownfield sites (those already developed on)
- Concern over potential loss of green corridors in East Oxford impacting biodiversity and wellbeing
- Health risks associated with contaminated land
- Concerns over the impact of new high density housing developments on existing communities, such as in Kidlington and Water Eaton

### **General Comments Collected During Consultation**

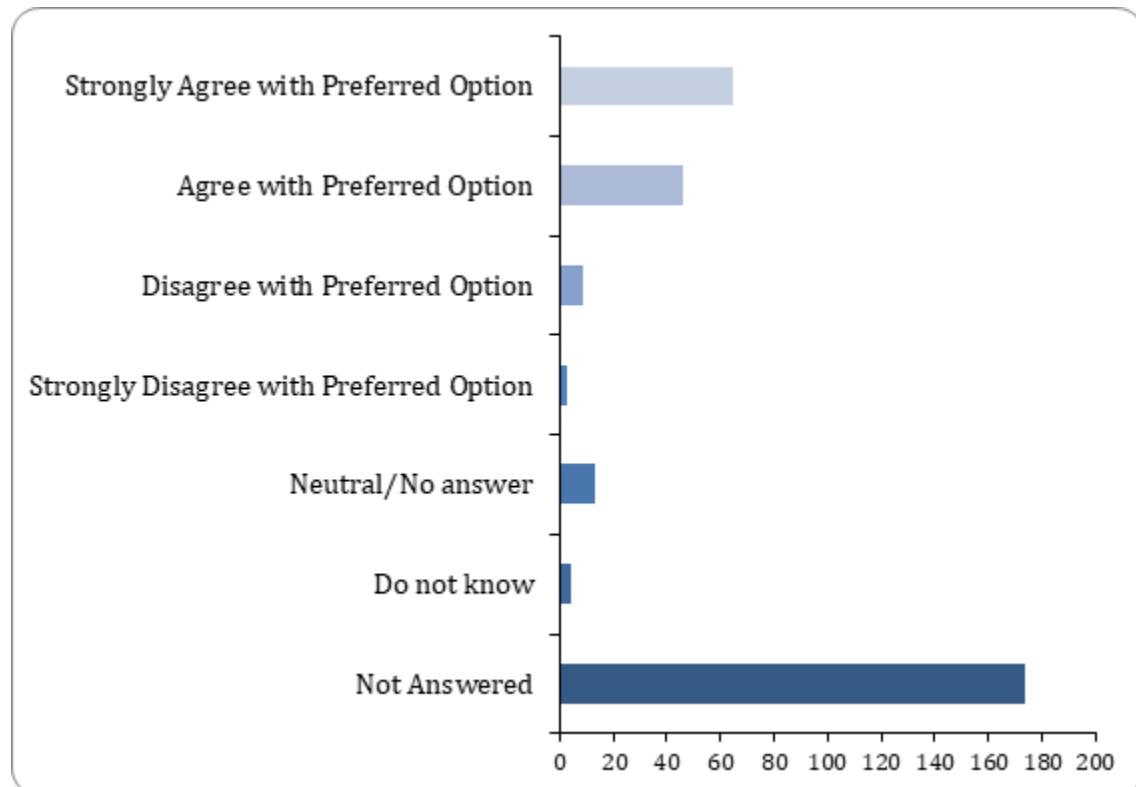
- Support for 15-minute city principle
- Transport concerns: park and ride, congestion, anti-LTNs, potholes, stationary traffic outside of Westgate centre, cycle highways, trams etc.
- Council tax is too high due to over-regulation

## Infrastructure

### All Public Responses - Draft Policy I1

Please tell us what you think about policy options set 014b (draft policy I1): Digital Infrastructure to support new development. If you have any additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	65	20.70%
Agree with Preferred Option	46	14.65%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	3	0.96%
Neutral/No answer	13	4.14%
Do not know	4	1.27%
Not Answered	174	55.41%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
I1	Broadband connectivity in new developments	<p>Pre-installing gigabit-ready ducts and risers while trenches are open costs pennies per unit and future-proofs buildings for the knowledge economy Oxford relies on; denying it would mean ripping up pavements later at far higher social and financial cost.</p> <p>Requiring developments to have appropriate digital infrastructure from the development stage will aid accessibility and ensure that needs for later remedial works, with the associated disruption for residents of the city and those reliant on the spaces created, are minimised.</p>	Comment noted.
I1	Scope of policy	<ul style="list-style-type: none"> <li>This policy is too narrowly focused on broadband and data centres associated with new developments. The policy framework in the Plan should be broadened to provide for the full range of contemporary digital infrastructure requirements, including digital screens associated with existing developments, which are essential to sustaining the vitality of contemporary city centres and ensuring inclusivity and equality.</li> </ul>	<p>The policy already includes requirements for minimising the visual and amenity impacts of digital infrastructure. In combination with other policies of the plan, there are sufficient instruments to ensure that installations are not sited in inappropriate locations or have unacceptable impacts.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<ul style="list-style-type: none"> <li>As evidenced through recent planning applications in the city centre, there is pressure for the installation of such technology, many in inappropriate locations, which is likely to escalate. A policy approach, with identification of opportunities in key locations for the installation of digital screens working collaboratively with key city centre stakeholders such as WOA, will ensure that such pressures are managed and such necessary infrastructure can be delivered in an appropriate manner.</li> </ul>	
I1	Support with suggested amendments	In I1, Data centres may be a commercial use rather than a digital infrastructure, so might not need for a special mention here.	While they are commercial in nature, data centres are forming an increasingly important element of the digital infrastructure that supports the economy and day to day life, and as such their impact as a sector goes beyond what will be the case for a typical commercial enterprise.
I1	Policy not adequate as written	All new data centres should be required to provide details of likely water and electricity requirements. It is confusing that in relation to R5 that there is a limit on domestic water use but that in relation to data centres which use large volumes of water for coolant purposes no restriction is applied to them as part of the planning process. Similar considerations apply to electricity supply where the grid is unable	Policies R1 (net zero buildings in operation) and R5 (water resources and quality) include requirements for energy and water usage that apply to non-residential/commercial development, which data centres will fall under. It is also unlikely that such proposals are likely to come forward at a significant scale within the city's boundaries due to spatial constraints that would limit the availability of suitable sites.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		to satisfy demand at certain critical periods.	
I1	Objection to data centres	Object to the approval for data centres. These conflict with previous supports intensification of employment land. To my knowledge, data centres do not need to be located near to users and so should be treated in the same way as warehousing.	There is a move by government towards considering data centres and similar facilities as critical infrastructure in support of national and regional economic development. Approvals of proposals will still be on the basis of their being sited in suitable locations and in compliance with other relevant plan policies. It is also unlikely that such proposals are likely to come forward at a significant scale within the city's boundaries due to spatial constraints that would limit the availability of suitable sites.
I1	Specific policy unnecessary	I disagree if this makes it more difficult and costly to build more homes	Building regulations also include standards for broadband ready new homes, which this policy will be in alignment with.
I1	Specific policy unnecessary	Have no specific policy	The NPPF requires local planning policies to facilitate the development and expansion of digital infrastructure. They are also recognised as significant infrastructure in national policy and it is therefore considered appropriate to refer to them as such in the local plan.
I1	Specific policy unnecessary	5G internet is so fast and reliable for the home I'm not sure physical internet connections are so important anymore. It'd be interesting to know how many people are making the switch. Make sure there is decent 5G connection. If you insist on going for a physical connection then I think look beyond 1G, in another 5 years I think that'll look slow, that's not future proof.	Mobile connectivity still requires a level of physical infrastructure to support its operation. Building regulations also include standards for broadband ready new homes, which this policy will be in alignment with.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
I1	Mandate service conduits	<p>One current issue is that every new development digs another channel under the streets, which collapse and are not properly resurfaced by the Council. (We have 50 or so of those in our street for example.). Would it help to have some policies that pre-position service conduits in key areas, and mandate developers to use those rather than creating yet more surface damage?</p>	<p>Through this policy and other design policies, developers are encouraged to consider the placement and integration of conduits, access points for maintenance etc from the earliest design stages. While the city council is not the highway authority that manages approvals for roadworks (that is the county council), the delivery of buildings that are already futureproofed for digital infrastructure will hopefully mitigate the level of disruption for new development at least.</p>

## Statutory Consultees Responses – Draft Policy I1

Oxfordshire County Council

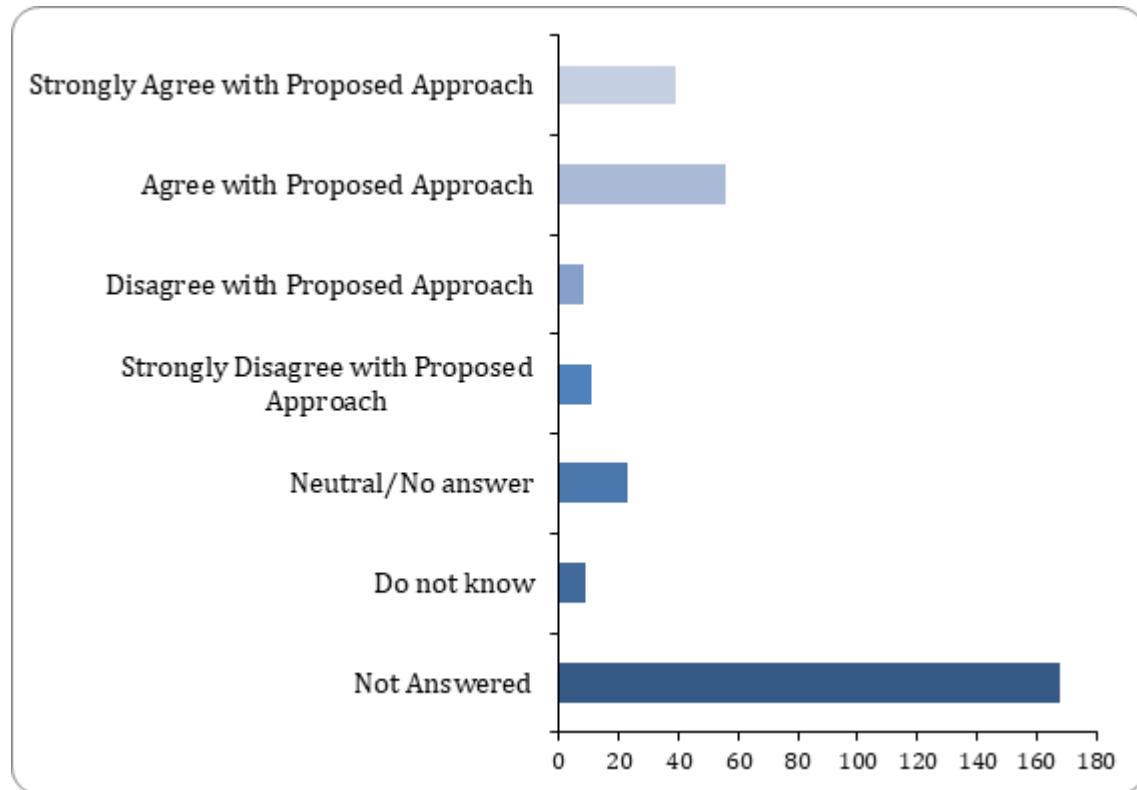
<b>Draft Policy</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Policy I1 - Digital Infrastructure	<p><b>Digital Connectivity</b></p> <p>Oxfordshire County Council supports this policy however we would request a change to part d) of the policy as follows:</p> <p><i>“actively where required support the effective use of buildings, outdoor spaces and the public realm to accommodate well-designed and suitably located mobile digital infrastructure; minimise impacts of digital infrastructure on the visual amenity, appearance and character of buildings and surrounding areas, and minimise impacts on the amenity of occupiers and neighbours of development.”</i></p> <p>This gives more strength to the requirement.</p>	<p>Unclear whether the change “strengthens” the requirement or not. Although it potentially widens its application, it may weaken situations where there is an actual requirement to deliver digital infrastructure.</p> <p>Will consider how best to address this in the next stage of the plan.</p>	<p>Oxford City Action:</p> <p>Consider wording of bullet point d)</p>

## Areas of Focus

### All Public Responses to North Oxford (Northern Edge of Oxford) Area of Focus

Please tell us what you think about our approach to identifying the North Oxford (Northern Edge of Oxford) Area of Focus

There were 146 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Proposed Approach</b>	39	12.42%
<b>Agree with Proposed Approach</b>	56	17.83%
<b>Disagree with Proposed Approach</b>	8	2.55%
<b>Strongly Disagree with Proposed Approach</b>	11	3.50%
<b>Neutral/No answer</b>	23	7.32%
<b>Do not know</b>	9	2.87%
<b>Not Answered</b>	168	53.50%

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
Northern Edge of Oxford AOF	Collaboration with Wolvercote Neighbourhood Forum	<p>The Plan proposes four 'Areas of Focus' that will each have 'an overarching policy'. One of these is proposed to be 'The Northern Edge of Oxford Area of Focus', which will (presumably, in view of its name) overlap with the Wolvercote Neighbourhood Forum area. However, the vagueness of its name makes this unclear. We are surprised there has been no consultation with WNF about it, and we note there is no mention of the Wolvercote Neighbourhood Plan in relation to it. Seven reasons are given for identifying this Area of Focus, one of which will be provocative to our residents: 'Generally low-density suburban development therefore has potential for intensification'. We ask that the Plan makes clear that the 'overarching policy' to be developed for this Area of Focus will be developed in collaboration with WNF, to ensure it fully takes account of the views of its residents.</p>	<p>Reference is made to the Wolvercote Neighbourhood Plan in the introduction to the North Infrastructure Area. The description of the area at Regulation 18 it is considered did make it clear the broad area applicable, and the bullet points of key considerations provided thoughts to respond to.</p>

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
Northern Edge of Oxford AoF	Support	The approach set out in the policy is supported. It would be useful to have wording to recognise that developments such as Oxford North have already contributed to providing significant improvements to pedestrian and cycling infrastructure as well as public transport.	Comment noted.
Northern Edge of Oxford	Support but no urban sprawl	But need to ensure that this AoF does not become urban sprawl and erode any further into the Green Belt.	The Plan only applies within Oxford City Council's boundary.
Northern Edge of Oxford	Support but need to think about infrastructure	Supports development and understands it is needed, but needs to ensure more infrastructure is built in accordance and improved active transport opportunities	Infrastructure needs in the North of the city are described in the Plan and in the Infrastructure Development Plan.
Northern Edge of Oxford	Disagree with car parking	Disagree with reducing car parking	Comment noted.
Northern Edge of Oxford	Concern about traffic	Transport policies are not strong enough and traffic is an issue in this area, the relocation of the Kassam could worsen this	The City Council is not the Highways Authority and the Local Plan set highways policy.

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
Northern Edge of Oxford	Concern about water table	Concern about development and intensifying North Oxford because of the impact on the water table across the city	General policies of the plan are concerned with groundwater impacts.
Northern Edge of Oxford	Support and could go further	Encourage an extension of this Focus Area northwards to be 'Science North' cluster as a nationally significant economic asset that demands a measure of cross-boundary co-operation at a spatial strategy level.	The AoF cannot extend northwards a that would be outside of Oxford City Council's boundary .
Northern Edge of Oxford AOF	Align with neighbouring authorities	We support the acknowledgement that this area is adjacent to other urban extension sites in Cherwell District Council and we would urge that on Areas of Focus (AOF) of this scale, the Council works effectively and proactively to ensure there is a joined up approach with neighbouring authorities, to guarantee neighbouring sites work in conjunction with each other and provide the necessary wider infrastructure. Reference should also be made to the close proximity to the Green Belt to this AOF and the important role it plays in providing a green gap between North Oxford and Kidlington. It should be acknowledged that the green belt	Comment noted. The Green Belt area referred to is within Cherwell DC area.

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
		needs to remain and be protected to ensure the gap is not lost and the areas of development merge into one another.	

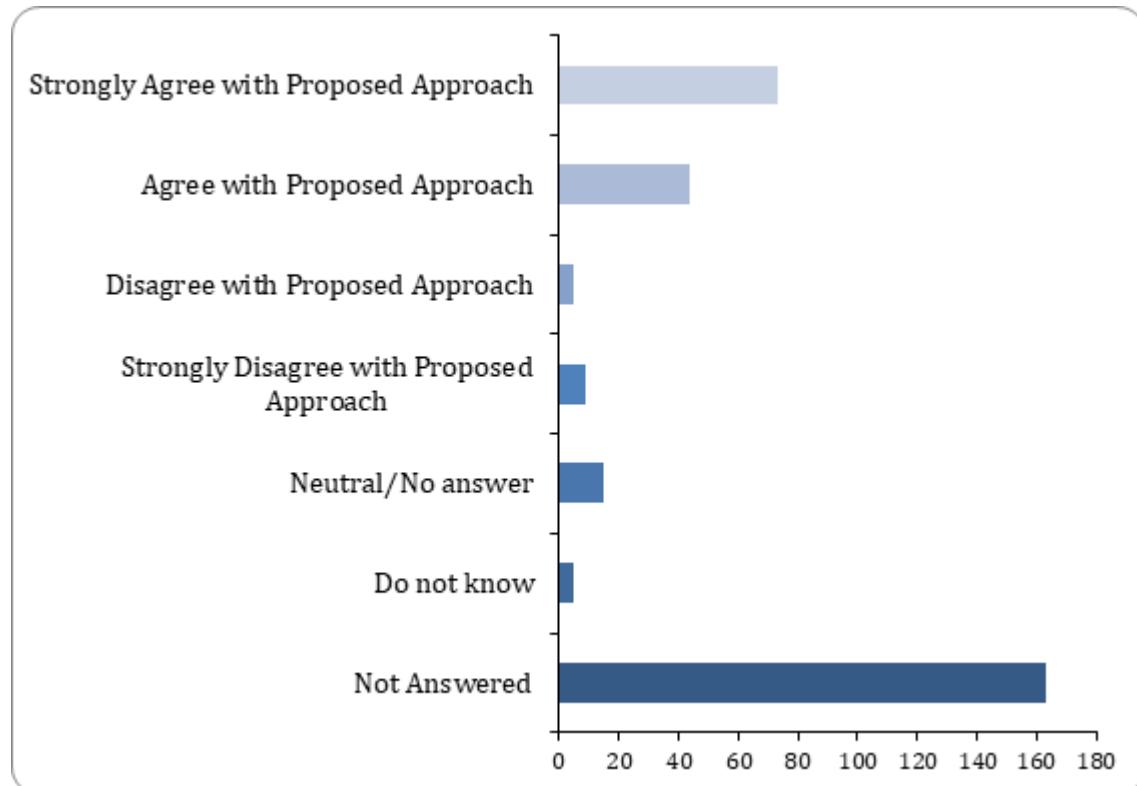
### Statutory Consultee Responses – North Oxford Area of Focus

There were no statutory consultee responses to this area of focus.

## All Public Responses to South Oxford (Cowley Branch Line, Littlemore and the Leys Area) Area of Focus

Please tell us what you think about our approach to identifying the South Oxford (Cowley Branch Line, Littlemore and the Leys Area) Area of Focus.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	73	23.25%
Agree with Proposed Approach	44	14.01%
Disagree with Proposed Approach	5	1.59%
Strongly Disagree with Proposed Approach	9	2.87%
Neutral/No answer	15	4.78%
Do not know	5	1.59%
Not Answered	163	51.91%

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
Cowley Branch line, Littlemore and The Lyes AOF	Support	<p>This area contains several of the city's key employment sites with the Unipart Site adjacent to the Area of Focus. Improved public transport connectivity, including the opening of passenger services on the Cowley Branch Line and the proposed station near Oxford Business Park will offer major opportunity. Many proposed developments are a long way from a station, so the Cowley Branch Line is needed.</p>	General support noted.
Cowley Branch line, Littlemore and The Lyes AOF	Support	<p>Network Rail welcome their inclusion of the Cowley Branch proposal and policy to maximise development value in and around the two proposed stations.</p> <p>Network Rail supports an approach which favours sustainable travel modes. The</p>	Support noted. Added additional text in relation to level crossings.

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
		<p>oxford station connectivity study has been designed to promote sustainable travel choices for Oxford Station and those stations nearby which also serve travel into the city. This has included a number of cycle parking's around Oxford station and leisure car park to ease pressure within the immediate station environment. It should also be noted that the area surrounding Oxford Parkway station is likely to be subject to master planning activities over the next 12 months. Development sites coming across the area should seek to reduce car parking in line with Policy C8 – Network Rail recognise the ambitions to reduce parking within the Oxford Station area. The station gateway movement</p>	

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
		<p>principles state plans should aim to limit parking provision where there is good accessibility to a range of facilities. Whilst promotion of sustainable transport methods is favoured, there is currently no provision at Oxford South for car parking, drop off/ pick-up, disable parking or bus links.</p> <p>The non-provision of bus access from Grenoble Road or Shuttle bus from Grenoble housing needs to be considered when providing accessible public transport options. The policy also makes references to the proposed CBL railway stations at Oxford Science Park and in the vicinity of ARC Business Park. In order for these stations to be delivered Mallams footpath level crossing must be formally closed as currently part of the PROW</p>	

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
		<p>network and the nearby Spring Lane Level Crossing upgraded as an alternative to Mallams as part of the Cowley Branch project.</p> <p>The policy should therefore recognise and reference the need to close this level crossing before the stations can be delivered.</p>	
Cowley Branch line, Littlemore and The Lyes AOF	Support and working in better partnership with south and vale	<p>Good idea but better joint working is needed. Support for more tree cover and would like to see urban sprawl and green belt is protected.</p>	General support noted. Urban sprawl and green belt are covered under national policies.
Cowley Branch line, Littlemore and The Lyes AOF	Support	<p>Lots of support for more tree cover and policies.</p>	General support noted.

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
Cowley Branch line, Littlemore and The Lyes AOF	General support	Support but would want to see infrastructure and travel infrastructure significantly improved	General support noted. The policy covers infrastructure improvements.
Cowley Branch line, Littlemore and The Lyes AOF	Disagree with elements	Disagree with high-rise condensed housing and reduced parking. LTNs have made traffic worse and better public transport links are needed.	The policy specifically support improvements to public transport links. The policy explicitly requires buildings of height to be carefully designed and this is also required under other policies in the plan (HD9).
Cowley Branch Line AOF	Templars Square clarification	According to the Preferred Options Draft Policy Map, Templars Square is outside of the Cowley Branch Line, Littlemore and The Lyes AOF. The Templars Square site does however lie within the 1,500m buffer zone of the proposed CBL stations. Being outside of the CBL AOF, we are of the view that financial	As the nearest district centre to the proposed CBL stations, the role and importance of Cowley primary district centre in both serving the local community and local workforce is likely to increase, with associated increases in footfall at the centre. A recent announcement from Govt proposed £120m towards the £155m rail infrastructure costs. However, there is an additional suite of public realm and active travel related improvements which will be sought via S106 contributions, rather than CIL. As such, the plan introduces (through Policy S3) an expectation for financial contributions to be sought from new trip-generating

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
		<p>contributions associated with the delivery of the CBL would not be sought. We request clarification on this, given the impact such an approach would have on deliverability and viability. Any contributions towards the CBL should be delivered through CIL.</p> <p>It is noted that detailed policies around infrastructure contributions and site allocations are not included in the current consultation version of the draft Local Plan. Further review and comments will be provided when further detail is shared/becomes available in subsequent policy consultations on the draft Local Plan.</p>	<p>development within a 1,500m buffer zone of the proposed CBL stations in order to achieve public transport enhancements in this area including sustainable transport measures, in accordance with the paragraph 58 tests (NPPF, Dec 2024). We have included a specific cost for the "CBL S106 contributions" in our Local Plan Viability Assessment which will be published at the next consultation stage.</p> <p>The area of focus will have its own specific policy, which introduces area-specific policy requirements.</p>



## Statutory Consultee Responses – South Oxford Area of Focus

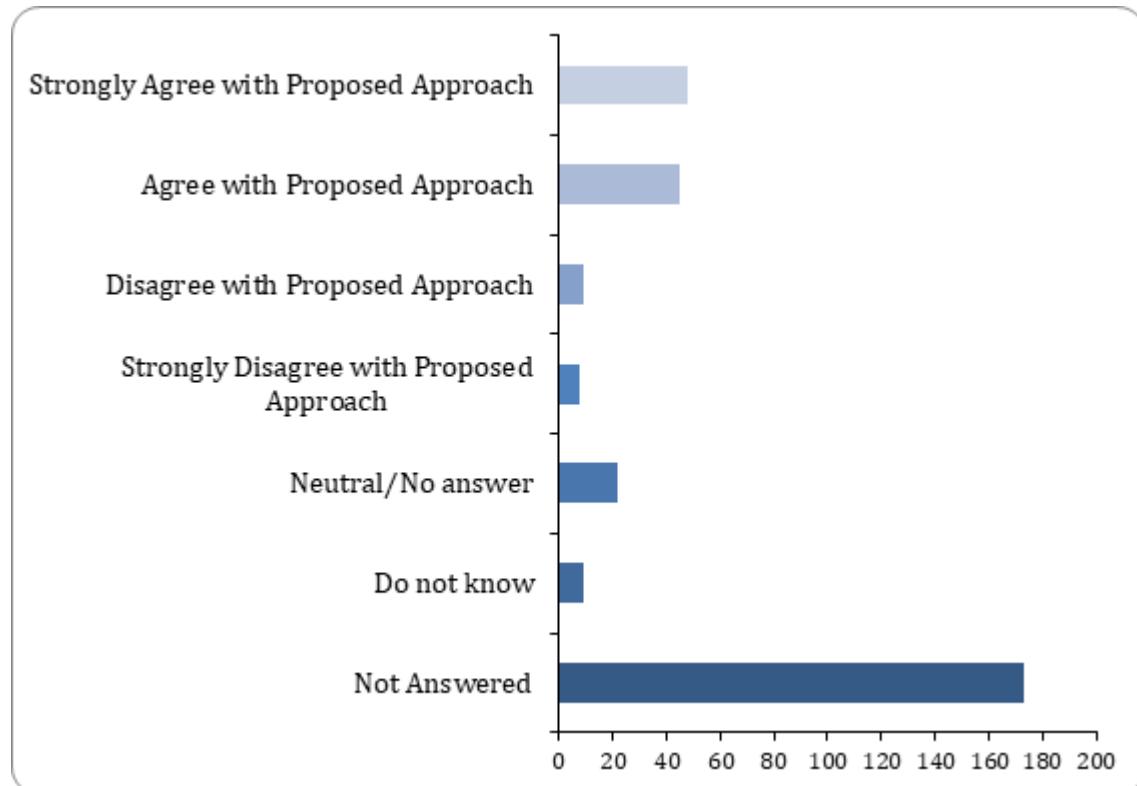
Oxfordshire County Council

<b>Draft Policy</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Cowley Branch Line, Littlemore and The Leys Areas of Focus	<b>Strategic Planning</b>  We look forward to seeing the proposed wording for this area of focus, noting that work is underway regarding the Cowley Branch Line (CBL) therefore, the County Council will continue its engagement with the City to assist in drafting a local plan policy which captures the flexibility and requirements to deliver this important piece of infrastructure.	Noted.	No Action Required – see comment in relation to S3 above.
	<b>Place Planning and TDM (Central)</b>  There is a need to better integrate employment sites to the city's P&R network. There is a need for existing and future development to be better integrated into the surrounding areas, particularly in terms of walking and cycling.	What infrastructure is needed to deliver these outcomes that is in addition to the schemes included in the IDP? Is it in publicly available documents that we can reference and include? Are the schemes within Oxford city?	No Action Required

## All Public Responses to East Oxford (Marston Road and Old Road) Area of Focus

Please tell us what you think about our approach to identifying the East Oxford (Marston Road and Old Road) Area of Focus.

There were 141 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	48	15.29%
Agree with Proposed Approach	45	14.33%
Disagree with Proposed Approach	9	2.87%
Strongly Disagree with Proposed Approach	8	2.55%
Neutral/No answer	22	7.01%
Do not know	9	2.87%
Not Answered	173	55.10%

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
East Oxford – Marston Road and Old Road AoF	Support	Centre of Islamic Studies supports inclusion of its sites on Marston Road (Govt Buildings and Harcourt House) within the Area of Focus.	The support is welcomed.
East Oxford – Marston Road and Old Road AoF	Opposition	Opposition to lots of development and losing character of the place. Existing buildings should be at the forefront	The intention of the Local Plan is to manage development but not to prevent it.
East Oxford – Marston Road and Old Road AoF	Concern	Concern about biodiversity and infrastructure in this area and loss of green space  Concern about provision of better public transport and active travel routes	These concerns are addressed by the AoF policy.

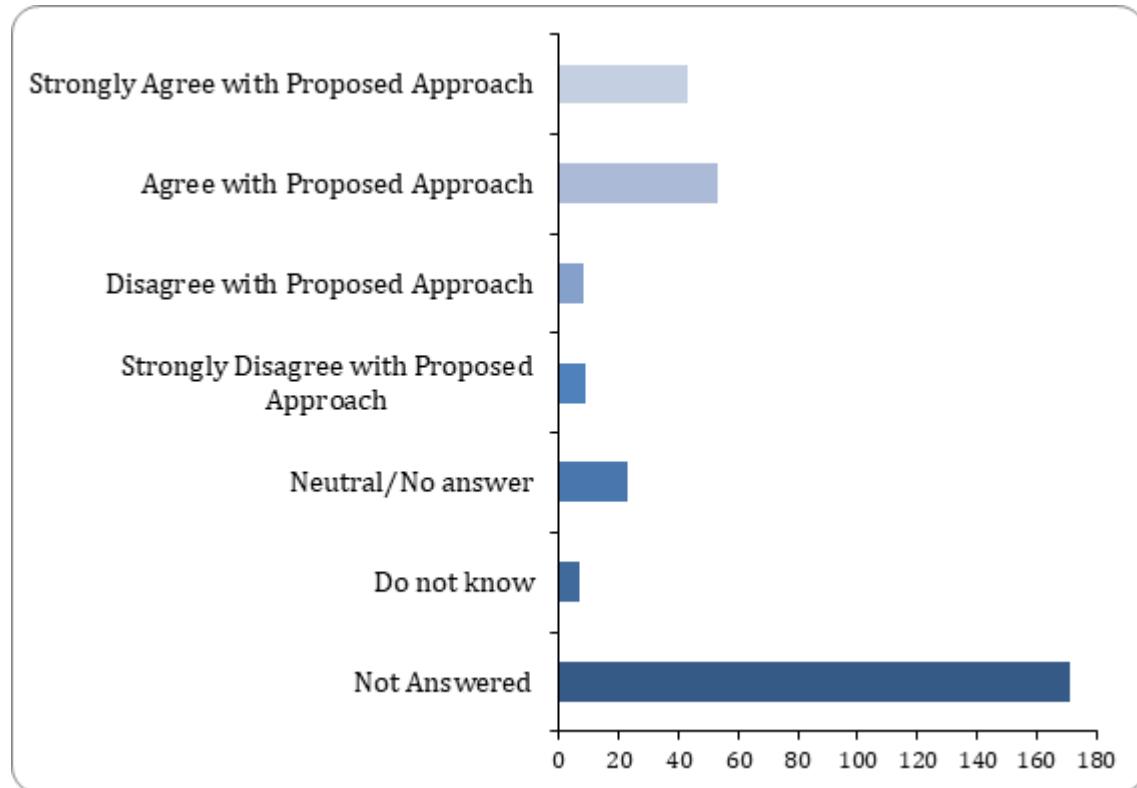
## Statutory Consultee Responses – East Oxford Area of Focus

There were no statutory consultee responses to this area of focus.

## All Public Responses to University Areas North of City Centre Area of Focus

Please tell us what you think about our approach to identifying the University Areas North of City Centre Area of Focus.

There were 143 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	43	13.69%
Agree with Proposed Approach	53	16.88%
Disagree with Proposed Approach	8	2.55%
Strongly Disagree with Proposed Approach	9	2.87%
Neutral/No answer	23	7.32%
Do not know	7	2.23%
Not Answered	168	54.46%

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Outcome</b>
University Areas North of City Centre Area of Focus	General support	<p>General support to this but thinks other areas should be prioritised</p> <p>Better public and active transport needed</p> <p>Protection of green space and urban sprawl</p> <p>Good to communicate with the University</p>	The AoF does not prioritise this area, but is merely an acknowledgement that there are benefits to overarching policies across this area, as there are linked issues best dealt with by the broad policy than by small, individual site policies. List captures some of the issues covered by the policy.

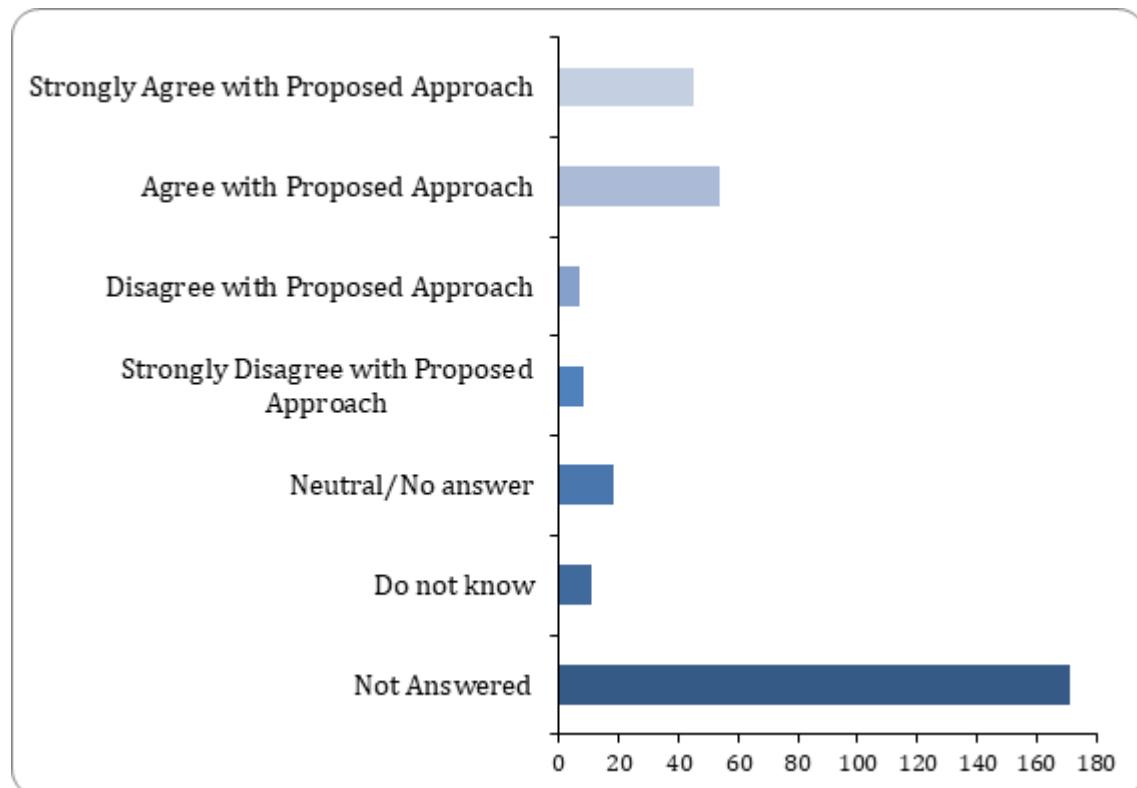
### Statutory Consultee Responses – University Areas Area of Focus

There were no statutory consultee responses to this area of focus.

## All Public Responses to West End and Botley Road Area of Focus

Please tell us what you think about our approach to identifying the West End and Botley Road Area of Focus.

There were 143 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	45	14.33%
Agree with Proposed Approach	54	17.20%
Disagree with Proposed Approach	7	2.23%
Strongly Disagree with Proposed Approach	8	2.55%
Neutral/No answer	18	5.73%
Do not know	11	3.50%
Not Answered	171	54.46%

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Outcome</b>
West End and Botley Road AOF	Nuffield Sites	<p>A key objective for the Nuffield sites is for the masterplan to be a commercial led proposition which has the ability to revitalise the route from the station to the City Centre and to make a significant contribution to the creation of a wider Innovation District in the West End.</p> <p>The withdrawn 2040 Plan identified the West End and Botley Road AOF as ‘an appropriate location for employment-related development opportunities which seek to build on Oxford’s key economic strengths that link research, education and social enterprise in areas such as life sciences and energy.</p> <p>Given the high demand for commercial research and development space and specific developer interest, it is likely that this sector will be the main river of development across the area’. It also stated that ‘there are also opportunities to accommodate a range of other sectors and uses, such as the creative and digital industries, as well as affordable workspaces for start-ups, co-working spaces, or even community uses where feasible across the wider area that this AOF covers’. These aspects of the withdrawn Plan</p>	<p>The Council has maintained a dialogue with landowners in relation to policy development.</p> <p>We have reviewed these comments and taken them into account when producing the Area of Focus Policy.</p>

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Outcome</b>
		<p>continue to be supported by Nuffield as relevant for inclusion in the 2042 draft Plan, subject to viability considerations as outlined above.</p> <p>The Nuffield Sites are fundamental in supporting the delivery of an Innovation District in this key part of the city and assisting to realise the potential of Oxford's West End by supporting Oxford's knowledge economy, provision of commercial space and providing opportunities for a variety of occupiers from SMEs and startup businesses, research and development/life sciences occupants to head quarter office spaces.</p> <p>There is also the additional benefit that they are all in a single ownership allowing the owner to think strategically about the nature of the uses on parts of the sites, thereby promoting a Masterplan.</p> <p>Given the importance of the new Local Plan in establishing the planning policy framework and policy platform for the Nuffield West End Masterplan, it is important to ensure the 2042 Local Plan is sufficiently defined on site specific aspects whilst providing the necessary flexibility when applying wider Local Plan planning policies to such site proposals, to ensure they</p>	

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Outcome</b>
		are able to successfully deliver a transformational development, new living accommodation, employment growth in the form of a new innovation district at the Nuffield Sites and enable the delivery of significant benefits for the community and for Oxford.	
West End and Botley Road AOF	Osney Mead	OUD continues to strongly support the inclusion of Osney Mead in the West End and Botley Road Area of Focus and the recognition in the draft Plan of the significant development and regeneration opportunities here.	The support is welcomed.
West End and Botley Road AOF	Support	Strongly supportive of development of Oxford's West End.	The support is welcomed.
West End and Botley Road AOF	Views/Building heights	Development within the West End and the Botley Road needs very careful management to prevent detrimental harm to the views out towards the western hills from the city centre, and views back from the western hills towards the historic city centre. This is a highly sensitive location – with Botley Road sitting within some of the key historic defensive views out from St Georges Tower to the west. More specific reference needs to be made to this to ensure buildings will be limited to appropriate heights.	These concerns are addressed through a combination of the AOF and other policies in the plan.

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Outcome</b>
West End and Botley Road AOF	Support	BL supports the recognition that the West End and Botley Road Area of Focus will see significant development and regeneration opportunities.	Support noted.
West End and Botley Road AOF	Network Rail	<p>Network Rail supports the allocation of the West End and Botley Road area as an 'Area of Focus' and the recognition that:</p> <p>a) 'The redevelopment of Oxford railway station presents the opportunity to create an easy and attractive transport interchange between rail, bus and active travel; and</p> <p>b) 'There is a significant opportunity to create high-density urban living with good provision and access to open space and a vibrant mix of uses, and also that make a significant contribution to the knowledge economy'. Network Rail would encourage any future draft wording for the proposed Area of Focus to reflect the acknowledgements outlined above to enable the area to reach its full potential.</p>	Support noted.
West End and Botley Road AOF	General support but concern about infrastructure	<p>Efforts need to ensure environmental, cultural, societal and commercial impacts</p> <p>Car parking needed. Concern about all infrastructure and transport infrastructure</p>	These concerns are addressed by the AOF (where relevant), and by other specific policies in the plan.

<b>Draft Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Outcome</b>
West End and Botley Road AOF	More homes needed	More homes needed to support development	The plan's over-arching strategy prioritises housing.
West End and Botley Road AOF	Support	Commentary supporting as this area is already built up with significant retail and commercial areas	Support noted.
West End and Botley Road AOF	Concern about flooding	Concern that majority of this area is in flood zone 3b	Policies elsewhere in the plan address flood risk. We have produced a Strategic Flood Risk Assessment which provides flood risk maps for the city.

## Statutory Consultee Responses – West End Area of Focus

There were no statutory consultee responses to this area of focus.



## Comments on All Areas of Focus

This section contains all comments received regarding all areas of focus, including public and statutory responses.

Topic	Summary	Response	Outcome
AOFs	Options do not consider opportunities outside of city boundaries	<p>The Draft Plan identifies Areas of Focus. There is a critical omission in the options presented in that it does not consider opportunities for expanding beyond the city's boundaries. In reviewing the reasons for identifying the areas as presented, supporting the regeneration of existing areas within Oxford, supporting infrastructure investment – would all equally apply. The draft Plan refers to ongoing discussions with neighbouring authorities and identification of areas of focus beyond the city's administrative boundaries would assist and focus discussions.</p>	<p>While the surrounding context and other activity in neighbouring districts may be taken as one of the wider considerations, the spatial and allocation policies within the plan can only apply within the local planning authority boundaries.</p>
AOFs	Scope of AOF beyond site allocation	<p>ChCh generally supports the proposal to identify several 'Areas of Focus. The 'West and Central Area quadrant of the City' quadrant includes the 'West End and Botley Road Area of Focus'. ChCh agrees that this area "offers some significant development and regeneration opportunities". ChCh notes that the Areas of Focus have huge potential to help deliver the housing and economic needs of Oxford, in</p>	<p>The AoF policies cover issues relevant across a larger area, with multiple sites and also areas that are not identified sites or don't have a site allocation policy.</p>

Topic	Summary	Response	Outcome
		<p>particular the West End and Botley Road area. However, it is not clear from the Draft Document for consultation what these Areas of Focus will cover over and above any site specific allocation policies.</p>	

Oxfordshire County Council

Topic	Summary	Response	Outcome
Areas of Focus	<p><b>Place Planning and TDM (Central)</b></p> <p>We welcome the opportunity to review overarching and area specific policy.</p>	<p>Noted.</p>	<p>No Action Required</p>



## Site Allocations

This section contains all comments received regarding site allocations, including public and statutory responses.

### 1c – Red Barn Farm

No comments.

#### 1a1 - Northern Gateway (Oxford North)

Site no.	Site name	Summary	Response
001a	Northern Gateway	Objection – Do not allocate due to traffic, environmental (proximity to SAC) and economic reasons. This is directly next to the A34 the most congested and underspecified arterial route in the country, this will have severe countrywide negative impacts.	A lot of development in this area is already permitted and built out. This was supported by significant transport infrastructure works.
001a	Northern Gateway	Support - ONV supports the allocation of the Northern Gateway area within the Local Plan. At this stage the proposed wording for the final policy has not yet been provided.  However, discussions are ongoing with various parties with regard to these policies.  In relation to Oxford North, whilst ONV recognises the wider need for housing in Oxford, the focus of Category 1 employment sites must be for employment uses and housing should be located elsewhere, including using the	Not all of the housing part of the hybrid application has yet come forward.

Site no.	Site name	Summary	Response
		<p>strategy of meeting the need in adjacent districts with efficient transport routes to the employment sites. This has already happened in the context of the Northern Gateway, through the Cherwell Local Plan Partial Review – Oxford's unmet Housing Need plan that allocates circa 4,500 homes to the north of the development. Such housing will provide sufficient housing to meet the labour demands for Oxford North without diluting the site's potential to boost the supply of jobs locally. We believe that the Council should look beyond its boundaries to address such issues.</p>	

#### 1e - Pear Tree Farm

Site no.	Site name	Summary	Response
001e	Pear Tree P&R	<p>Among the already allocated sites there are three within our area: OUP Sports Ground; Northern Gateway; Peartree Farm. We ask that it be made clear that development at the last of these is conditional on a direct pedestrian/cycling route being constructed to link the site to Parkway station, which will require collaboration with Cherwell District Council.</p>	<p>This connection is noted as important in the draft allocation policy.</p>

#### 6b - Banbury Road University Sites – Parcel B

No comments.

### 8a - Bertie Place Recreation Ground

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
008a	Bertie Place Recreation Ground	<p>Whilst we are aware that the site has previously been allocated for housing, this should not come at the expense of a public playground for children and families, which it is not intended to replace like for like. Other sites should be explored which does not result in the loss of a well-used community facility</p>	<p>All suitable and available sites with development potential are being considered as part of our efforts to address the city's housing need. The plan also recognises the importance of public open space, and other forms of green infrastructure. The allocation policy seeks to balance between providing housing on a suitable site and ensuring that the key function of the site as a public open air recreation ground is retained.</p>
008a	Bertie Place Recreation Ground	<p>Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.</p>	<p>The designated core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces'). Development schemes affecting supporting</p>

Site no.	Site name	Summary	Response
			spaces, such as Bertie Park, will be required to reprovide affected spaces to the same standard or higher (see responses for policies G1 and G2).
008a	Bertie Place Recreation Ground	The considerable difficulties with the reprovision of the site have led OCC to suggest inclusion of Bertie Park as a site for development in the 2042 plan without the inclusion of a planning condition requiring re-provision. The impossibility of complying with NPPF s.104 means that grounds for its inclusion should be re-visited. It should not be re-included solely on the basis that it has been on the plan for a quarter of a century. Or that we have been consulted before.	The allocation policy specifically includes a requirement for reprovision of the existing playground. Reprovision will also be a requirement for any scheme to be compliant with the policies in the emerging plan (see policy G2). We consider this approach is compliant with national policy, this is addressed in more detail in the sections dealing with green infrastructure, policies G1 and G2 in particular.
008a	Bertie Place Recreation Ground	1. Flooding. All advice from the Environment Agency indicates significant increase in flooding 2. Safety. Advice from the police is that alternative recreation area is not a safe place for children to play.	The allocation policy includes site specific requirements for surface/ground water assessments, incorporated sustainable drainage systems and

Site no.	Site name	Summary	Response
			<p>management plans to deal with surface water flooding risks.</p> <p>The policy requirement with respect to the reprovision of current recreation facilities is that the playground is within the site boundary, at the same standard or higher (see policy G2), and it is expected that sound design principles such as those included in guides such as Secure by Design are followed.</p>

## 11 - Canalside Land, Jericho

Site no.	Site name	Summary	Response
011	Canalside Jericho	<p>Nothing's happened for so long. The view of the church from the towpath should not be blocked by housing. This is on the canal, built for boats, and should be a boatyard.</p> <p>There are few spaces along the canal to sit and enjoy it. An open square, greenery, cafes and a wharf are more appropriate for the site.</p>	<p>It is likely some enabling development would be needed to bring the site back into use.</p>

Site no.	Site name	Summary	Response
011	Canalside Jericho	<p>The community and councillors have been very clear for many years that they need a new community centre, a public square and a boatyard, and it must be accepted that there won't be much room for housing. Definitely not student (especially speculative) house.</p>	<p>Comment noted.</p>

## 12 - Churchill Hospital

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
012	Churchill Hospital	Proximity to Lye Valley (abutting Lye Valley North fen) means that future of the site is of crucial importance to the fen ecology and water supply. Maintaining calcified alkaline groundwater supply to Lye Valley needs to go into the site-specific policy for the Churchill site.	Comment noted.

012	Churchill Hospital	<p>BBOWT welcome that this allocation no longer includes the meadow, which is an Oxford City Wildlife Site. The meadow is not only vitally important in relation to the Lye Valley but is also subject of an ecological compensation scheme for a housing development in Littlemore. Nevertheless, any development on this site is of the utmost concern with respect to the Lye Valley. Any development on existing urbanised surfaces will still need a whole suite of measures to ensure there is no impact on the SSSI and LWS. It is on surfaces that are currently green and free draining that any development would have most impact on the hydrology of the meadow through reducing the evening out effect that such green surfaces have on the amount of water flowing into the fen, which is particularly vulnerable to severe and permanent damage from short-term very high water flows. This matter is well dealt with in the detailed study in the evidence library on the Lye valley and there is no need for us to expand on it here.</p> <p>Development on green surfaces also may well lead to less water flow during dry periods causing the fen to dry out, and impacts on water quality which also can have a highly negative impact on the fen. In our opinion therefore no development on currently green surfaces should take place on this site.</p>	<p>The site allocation policy will state that development proposals will need to avoid adverse effects on the SSSI. This is also required under Policy G6 of the plan.</p>
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012	Churchill Hospital	<p>Protected species constraints go beyond nesting birds and roosting bats. The most recent planning application on the site identified presence of reptiles (e.g. viviparous lizards), a number of which had to be captured and translocated to a specially built refuge on the site edge nearer the SSSI. Also, proximity to Lye Valley suggests slow worms and grass snakes could be present on site (as they are found in the valley). Thus, reptiles should be added to protected species constraints flagged in policy.</p> <p>Note that wording of sentence in relation to species constraints in reg 18 is incomplete.</p>	<p>We have conferred with ecologists, and the policy has been updated to include reptiles.</p>
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012	Churchill Hospital	<p><b>Parking Issues:</b></p> <p>The hospital has a total of 1506 parking spaces compared to a total of 2270 across whole of city centre. 4646 car parking spaces exist across the three hospitals with 70% allocated to staff.</p> <p><b>Modification Requested:</b> (Rep relates to LP2040 Policies)</p> <p>References to Policies G1, G3, G5 are not relevant and are not related to the SSSI – Policies G6 and G7</p> <p>Many specific statements about the Lye should NOT be included in the Site allocation policy but should be applied more generally (See comments on Policy G6+G7).</p> <p>Reduce parking in exchange for further development as discussed (Response R6 – Air Quality)</p> <p>The phrase “issues including parking are considered in a comprehensive way to make the most efficient use of land.” should be amended to: “in a comprehensive way to make the most efficient use of land, address the climate crisis and realise essential health, social and environmental benefits.”</p>	<p>Policies G1 – G3 and G6 are referenced in the site allocation policy as all are relevant and applicable to developments on this site. The site allocation policy also provides some additional detail in relation to the SSI and future development on this site..</p> <p>The site allocation policy references potential contamination of hospital and historic uses on the site.</p> <p>Wording relating to parking and efficient use of land has been updated.</p> <p>Development proposals will be considered against requirements set out in the plan as a whole which would include landscaping</p>
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		<p>“A buffer zone should be provided during the construction period to avoid disturbance to the adjacent SSSI.” Add “in operational phase”</p> <p>“because of the use as a hospital some areas of potential contamination are present on the site” – site contamination is mostly caused by asbestos and WWII contaminants, not hospital use.</p> <p>WWII buildings and assets must be identified and retained.</p>	<p>buffers and impacts on the SSSI during operational phases.</p> <p>The site allocation policy specifically references the WWII buildings as non-designated heritage assets which should be enhanced.</p>
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#### 14 - Templars Square

Site no.	Site name	Summary	Response
014	Templars Square	Crucial to local life and being allowed to die store by store. We need the shops in a warm and accessible indoor centre.	The draft allocation policy is clear that the centre must keep its district centre function, although retail specifically is not its own use class in the planning system anymore. However, being covered or not will be a detailed

Site no.	Site name	Summary	Response
			design decision and is not a requirement of the policy.

#### **16 - Cowley Marsh Depot**

No comments.

#### **17 - Crescent Hall**

Site no.	Site name	Summary	Response
017	Crescent Hall	Comment: Substantial Roman pottery activity has been identified in the general area.	The potential for the site to contain archaeological remains is low to moderate. (The site is within a very large zone of general potential for Roman kilns).

#### **18 - Diamond Place and Ewert House**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
018	Diamond Place and Ewert House	Site should include medical facilities if possible.	The draft allocation policy lists healthcare uses as a suitable use on the site.

## **20b2 - Elsfield Hall, Elsfield Way**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
020b2	Myers Briggs, Elsfield Hall, Elsfield Way	We are pleased to see a proposal to convert the existing office accommodation to residential, which will be more appropriate at that location.	Support is welcomed.

## **21 - Faculty of Music, St Aldates**

No comments.

## **24 - Government Buildings & Harcourt House**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
024	Government Buildings and Harcourt House	Very important that any development have very minimal impact on the character and sense of seclusion of Headington Hill Park. Windows of buildings overlooking the park would have significant detrimental impact.	The importance of the interface with the park is noted in the draft site allocation policy.

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
024	Government Buildings and Harcourt House	<p>It is noteworthy that this site has remained vacant for a very long time and that the Policy SP16 was prepared in 2016 so 9 years ago and the site had been vacant for at least 10 years before that. This is an attractive spot in a prosperous part of the City there is absolutely no reason why it could not have been redeveloped years ago and yet the Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment.</p>	<p>The landowner has stated their interest in developing this site during the plan period.</p>
024	Government Buildings and Harcourt House	<p>The introduction of additional requirements (e.g., building performance/ ecology), on sites with longstanding viability challenges is likely to hinder redevelopment</p>	<p>Whole-plan viability testing has been carried out.</p>
024	Government Buildings and Harcourt House	<p>Welcome acknowledgement of the lawful employment use on site.</p> <p>We would wish to see the full range of uses set out under existing OLP2036 policy SP16 carried forward including complementary uses.</p>	<p>Noted.</p> <p>We will consider suitable uses for the site that align with our overarching strategy. LP2036 recognised Harcourt house as an employment site (Cat. 3). LP2045</p>

Site no.	Site name	Summary	Response
		<p>The Centre maintains an aspiration to include commercial research and development use within a site redevelopment to complement academic research. The commercial activities would be ‘spin out’ application of academic research as is the norm in the modern academic arena owing to obvious benefits from the co-location of cutting-edge academic research and its commercial application. The current Local Plan which allows for complementary uses has been important in allowing the Centre to advance development proposals.</p>	<p>considers Harcourt House as a “non-designated” employment site and introduces specific criteria relating to the redevelopment of non-designated sites outside of the city and district centres.</p>
024	Government Buildings and Harcourt House SA Form	<p>Disagree with negative rating against SA objective 11. The site contributes little to the character of the area and could be seen to detract from the heritage asset. Redevelopment of the site presents an opportunity to enhance the area, which should be viewed positively.</p>	<p>The reason for the negative SA rating on the SA Form is because in its current state, the site, as you point out, “contributes little to the character of the area and could be seen to detract from the heritage asset”.</p>

**26 - Jesus College Sports Ground (Herbert Close) and 32, 234 - Lincoln College and Jesus College Sports Grounds**

Site no.	Site name	Summary	Response
026, 032, 234	Jesus and Lincoln College Sports Grounds	These are key green spaces with woodland providing biodiversity and landscape value.	The draft site allocation policies note these features and require significant retention of green infrastructure.
026 and 032, 234	Jesus College Sports Ground and Lincoln/Jesus College Sports Grounds	<p>We assume that the reference to site 234 is an error as this site is not allocated in the Adopted Local Plan 2036. We appreciate that sites 026 and 032 are allocated in the existing Adopted Local Plan but we think that these allocations should be reconsidered because of the potential impacts of housing development on land that is now covered by green infrastructure policy G1.</p> <p>The arguments are very similar to those presented for Oriel College Sports Ground above, especially in relation to effects on the setting of the Conservation Area, visual prominence and loss of habitat connectivity. If, contrary to our preference, allocations here are confirmed, the City Council should ensure strong developer contributions, for example for provision of public outdoor space and biodiversity net gain. Affordable housing for NHS and university staff at the nearby Old Road Area of Focus (Warneford, Churchill, Old Road Campus) should be prioritised.</p>	The sites do need to be developed carefully, reflecting the sensitivity of the conservation area. The raft site allocation policies are drafted to ensure this happens.
026	Jesus and Lincoln	Do not support the inclusion of a policy.	

Site no.	Site name	Summary	Response
	College Sports Grounds	<p>Cowley is the most green-space-deprived suburb in Oxford. According to a study undertaken in 2006 it had only 1.14HA per 1000 residents in 2006 of a city-wide average, then, of 5.75HA, and with a now 11.2% population increase.</p> <p>This is the last large sports facility following the loss of other green space in the area. There is no suitable alternative available.</p> <p>Retaining some of the sports provision is NOT sufficient as it will not be adequate to service the needs of all at peak times, which invariably will mean residents can only use them at unpopular times.</p> <p>Most alternative sites to relocate sports facilities are already earmarked for development.</p>	<p>The data presented by the respondent was taken from a City Council study from 2006. The figures presented (both for Cowley and the city-wide average), relate to “publicly accessible green space”. While reference was made to the city-wide average of 5.75ha per 1,000 population within the Oxford Core Strategy 2026, that Plan sought to maintain an overall average of 5.75ha of publicly accessible green space per 1,000 population and set out clearly that, while it was desirable that this standard was maintained, it should not necessarily be applied as a requirement within all new developments and was, at that time, used as a basis to support on-site open space provision within larger developments.</p>

Site no.	Site name	Summary	Response
			<p>The desire to maintain 5.75ha of publicly accessible green space per 1,000 population was not carried forward into OLP2036.</p> <p>Regardless, Jesus and Lincoln College sports grounds are both private open-air sports facilities/ private open space.</p> <p>LP2042 proposes that both sites are wholly “supporting GI”. Site allocation policy wording will be drafted to ensure appropriate re-provision of sports pitches.</p>
026	Jesus and Lincoln College Sports Grounds	BBOWT disagree with the site allocation as it is in the Oxford Green Infrastructure Network. Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	Noted.
032	Lincoln College Sports Ground	Sports grounds are important to university culture and should be preserved. Already a very large student block	The policy does require that sports provision is retained or re-provided.

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
		nearby so concerned about adding to the high concentration.	
032	Lincoln College Sports Ground	Lincoln College support proposed site allocations in the Plan drawn primarily from previously allocated sites in the Oxford Local Plan 2036 and sites that were being considered in the (now withdrawn) Oxford Local Plan 2040. It is, however, important to note that the sites owned by Lincoln and Jesus Colleges are separate and therefore it is vital that each College is able to deliver each site individually and separately.	The Jesus and Lincoln Sports Grounds are proposed as separate allocations in the draft site allocation policies.

## 27 - John Radcliffe Hospital

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
027	John Radcliffe Hospital	The SA form says the site is within the setting of a conservation area, but part of it is within a conservation area, so this needs correcting.  Surface water flooding has been a serious issue recently, particularly in car park T.	SA form updated.  Policies require that development proposals consider and mitigate for surface water flooding.
027	John Radcliffe Hospital	Key issues for this site are as follows: <ul style="list-style-type: none"> <li>• Onsite Parking</li> </ul>	It is agreed that surface-level parking is not an efficient use of land.  New buildings and hard standing better manage surface

Site no.	Site name	Summary	Response
		<ul style="list-style-type: none"> <li>• Creating increased demand for housing</li> <li>• Huge basements which remove water retention capacity of land</li> </ul> <p>The hospital has a total of 2600 parking spaces compared to a total of 2270 across whole of city centre. 4646 car parking spaces exist across the three hospitals with 70% allocated to staff.</p> <p>The football fields of parking lead to:</p> <ul style="list-style-type: none"> <li>• Environmental and health issues due to traffic generated</li> <li>• Flooding in Marston and Northway due to vast surface level parking</li> <li>• Prime housing land wasted, which in turn would reduce the need to travel</li> </ul> <p><i>(Policy references are to LP2040 policy)</i></p> <p>Policy includes no targets to reduce parking provision</p>	<p>water runoff, and policy approaches require this. Parking should be rationalised to reduce unnecessary circulating and queuing around the site, and to reduce the amount of space it takes up. The level of parking will have to be strongly justified, with mitigations to avoid worsening wider impacts.</p>

Site no.	Site name	Summary	Response
		<p>There are long-standing surface water flooding issues in Northway relating to the John Radcliffe Hospital site. Future policy needs to be stronger and require a reduction of surface water flooding issues rather than seeking appropriate mitigation measures.</p> <p>Old Headington Conservation Area Appraisal does not discuss the John Radcliffe Hospital - it ignores it!</p> <p>Modifications proposed (<i>reference is to LP2040 policy</i>)</p> <ul style="list-style-type: none"> <li>• remove justification for retention of car parking based on need, instead it should reduce queueing,</li> <li>• parking should be replaced by development</li> <li>• “issues including parking are considered in a comprehensive way to make the most efficient use of land.” Amend to: “in a comprehensive way to make the most efficient use of land, address the climate crisis and realise essential health, social and environmental benefits.”</li> <li>• Protection and mapping of JR Green as Core Green Space</li> </ul>	

Site no.	Site name	Summary	Response
		<ul style="list-style-type: none"> <li>• Protection of Cuckoo Lane, Listed Walls, Treelines, significant view lines</li> <li>• Removal of confusion around reduction and mitigation of flood risk in favour of reduction or “net-zero”</li> <li>• Enforce use of SuDS and other systems with policy specifying that civil action will be taken if runoff continues • “</li> <li>• “Ostler Road and Ostler Way” is Osler Road, “Sandford Way” is Sandford Road.</li> <li>• Clear parameters for the protection of Cuckoo Lane, Listed walls and original John Radcliffe building and heritage barn near Osler Road/St Andrews junction • “</li> <li>• There is a helipad on the parkland grounds behind Headington Manor House” – No - This was temporary and removed.</li> <li>• Update wording that JR is partly inside the OHCA.</li> </ul>	

**28a, 28c - Kassam Stadium, Ozone Leisure Complex and Minchery Farmhouse and 28b - Overflow carpark at Kassam Stadium site**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
028a	Kassam Stadium	Don't want a new football stadium in the north-refurbish the existing.	Planning permission is granted for a new stadium in Cherwell District, so the policy should respond to this and the potential for the stadium moving. Even if it does not move, there is some potential for intensification around the stadium.
028a	Kassam Stadium	There needs to be provision of leisure facilities proportional to the increasing number of houses. Building on the additional parking area for the Kassam Stadium site will just make it that much harder to get to; it's not acceptable that it's 800m away from the nearest bus stop, as that is far too far to walk.	The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected alongside the allocation of new homes. Site #028a (Kassam Stadium) has good bus connections to Oxford city centre. Site #028b (Overflow Car Park) is 600m from a bus stop to Littlemore (5A every 30 mins). It is just over 800m to Pegasus Road stop with buses every 5-6mins to the city centre.

Site no.	Site name	Summary	Response
028a, 028b, 028c	Kassam Stadium and Ozone Leisure Park	<p>The promoter (who also owns the land) seeks permission for the following:</p> <p>Complete demolition of existing commercial (Class E)/ leisure (Sui Generis) buildings to allow for the phased redevelopment of the site. Redevelopment to include:</p> <ol style="list-style-type: none"> <li>1) Construction of mixed use R&amp;D laboratories (Class E(g)) with active ancillary uses (Class E(a),(b),(c),(d),(e),(f));</li> <li>2) Restoration of Grade II* Listed Minchery Priory public house (sui generis);</li> <li>3) Construction of community leisure building (sui generis);</li> <li>4) Construction of Cowley Branch Line mobility hub;</li> <li>5) Construction of electrical substation;</li> <li>6) Comprehensive hard and soft amenity and biodiversity landscape and public realm, and,</li> <li>7) Other supporting or ancillary works and infrastructure including access and servicing.</li> </ol> <p>Firoka supports the vision for Oxford 2042 that balances the provision of access to housing together</p>	Noted.

Site no.	Site name	Summary	Response
		<p>with nature, employment and social and leisure opportunities. To this end, we support the retained and refined allocation for the Firoka sites allowing for a mix of uses and confirm they are available and achievable. Firoka will be undertaking capacity studies ahead of the Regulation 19 stage of the Oxford Local Plan 2042, exploring densification potential appropriate to its potential future context of the reinstated Cowley Branch Line.</p>	
028a, 028c	Kassam Stadium and Ozone Leisure Park	<p>The policy SP14 was written before the proposed move by Oxford United Football Club to the Triangle at Kidlington. The move is very much at the planning stage and clearly there should be no consideration of any redevelopment of the Kassam Football stadium until the necessary planning permissions are in place and construction started as well as the required infrastructure such as foul water sewage and water supplies being ready. Policy SP14 needs updating to take this into account.</p> <p>As there is an existing playing field, this must be replaced before the site can be redeveloped.</p>	<p>The draft allocation policy does require reprovision of the sports provision before the stadium is developed for other uses.</p>

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
028a, 028c	Kassam Stadium and Ozone Leisure Park	<p>Littlemore Priory was approximately at the location of Minchery (Nuns') Farm policy must be updated to address this.</p> <p>Roman kilns have been found nearby Source_RPS 1996 OHER 16787 Kiln site</p> <p>Sewage overflow due concerns to proximity to Oxford STW</p>	Comments noted.

### **31 - Manor Place**

Historic England

<b>Site no. and name</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Site #31 Manor Place	Site assessment published for proposed allocation Manor Place does not appear to acknowledge proximity to a Grade I Registered Park and Garden.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

### **32 – Lincoln College Sports Ground**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
032	Lincoln College Sports Ground	Sports grounds are important to university culture and should be preserved. Already a very large student block nearby so concerned about adding to the high concentration.	The policy does require that sports provision is retained or re-provided.
032	Lincoln College Sports Ground	Lincoln College support proposed site allocations in the Plan drawn primarily from previously allocated sites in the Oxford Local Plan 2036 and sites that were being considered in the (now withdrawn) Oxford Local Plan 2040. It is, however, important to note that the sites owned by Lincoln and Jesus Colleges are separate and therefore it is vital that each College is able to deliver each site individually and separately.	The Jesus and Lincoln Sports Grounds are proposed as separate allocations in the draft site allocation policies.

### **33 - Littlemore Mental Health Centre, Sandford Road**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
033	Littlemore Mental Health Centre	We welcome the recognition of the site's development potential. The Trust has now undertaken initial planning feasibility work in this regard, based on the following objectives:  - Maintain and enhance the existing operational functions, but explore the potential for 'transformational growth' including additional operational facilities such	Comments noted and reflected in the draft policy drafting.

Site no.	Site name	Summary	Response
		<p>as additional inpatient capacity and accommodation for our expanding outpatient services;</p> <ul style="list-style-type: none"> <li>- Potentially provide facilities for other healthcare services ie primary care, community services, third sector etc;</li> <li>- Enhance existing areas of green space / biodiversity and their contribution to therapeutic treatments;</li> <li>- Provide better car parking management and improved accessibility. It would like these objectives to be recognised by the Plan.</li> </ul>	

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #33 Littlemore Mental Health Centre	Consideration should be given to the relationship with nearby assets, including any impacts on the character and appearance of Littlemore Conservation Area	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

Oxfordshire County Council

Site no. and name	Summary of comment	Response	Outcome
033 – Littlemore Mental Health Centre	<p><b>Landscape and Nature Recovery – Biodiversity</b></p> <p>This site is considered likely to have a significant negative impact on scrub by Heyford Hill Roundabout as well as Littlemore Railway Cutting SSSI and therefore likely contrary to policy G6.</p>	<p>Ecological impacts on all site allocations are assessed by the City Council in-house ecologist. Where sites impact SSSIs or other ecological areas, mitigation measures within the policy wording will be proposed.</p> <p>We can consider how the allocation can seek to reduce the impact on scrub at a roundabout.</p> <p>Littlemore Railway Cutting is a Geological SSSI so unlikely to</p>	<p>Oxford City Action:</p> <p>Consider ecological impacts of development and where negative impacts are likely, propose suitable policy wording to mitigate.</p>

Site no. and name	Summary of comment	Response	Outcome
		be impacted by development nearby.	

### 038a Thornhill Park (phase 2)

Site no.	Site name	Summary	Response
038a2	Thornhill Park	No need to include a site allocation policy – planning application already approved	While granting planning permission is generally considered a strong indication that development will go ahead, sites generally remain as allocations until development commences on site. As development has not yet commenced on <i>this</i> site, the site allocation will be retained in the plan.
038a2	Thornhill Park	Strongly disagree with the proposed development of phase 2.	Unclear if this refers to the granted planning permission, or if not, what aspect of the allocation.
038a2	Thornhill Park	The Shotover site provides a once-in-a-lifetime exceptional opportunity for Oxford and Oxfordshire to look forward and build upon its existing cluster of hospitals and life science	Noted. This is in reference to the adjacent site.

Site no.	Site name	Summary	Response
		<p>research to curate a bespoke biomedical healthcare research and development cluster on one site and at the boundary with Oxford City. This would enable deliver of better health outcomes for society and improved skills and educational attainment for the local population. This would be derived from establishing a sustainable, low carbon, accessible, world class biomedical research campus on land at Shotover, grounded within an abundant green landscape and deliver biodiversity net gain.</p> <p>The exceptional circumstances that justify the site's release from the green belt is the ability of a biomedical healthcare and research and development cluster to improve health outcomes on a local and global scale. This is bespoke to the Shotover site, given its sustainable location and its prime geographical positioning, being excellently connected to existing hospital locations in Oxford and the University of Oxford's Old Road Campus.</p> <p>The ability to unlock and realise the plan objectives rests with the role that employment land in the right location plays as vital infrastructure. Thus, the identification of employment land in the right location is critical.</p>	

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
038a2	Thornhill Park	Local resident – claims they were not consulted. Strongly disagrees that high rises would be in-keeping with the character of the neighbourhood. If the area needs to be developed, then 2-3 storeys would be acceptable. Expresses general disagreement with national policy for housebuilding.	All residents were posted leaflets about the consultation and advertisement of held events. Height and density policies in the plan address concerns about heights. National policy is out of the council's control.

#### **42 - Nuffield Orthopaedic Centre (NOC)**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
042	Nuffield Orthopaedic Centre	<p>Would support general residential development at this site. Not clear why employer-linked AH is supported (H6).</p> <p>Modifications requested:</p> <p>Policy needs to address the key issues linked to this site (summarised as follows):</p> <ul style="list-style-type: none"> <li>• Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs</li> <li>• Onsite Parking</li> <li>• Creating increased demand for housing</li> </ul>	We will consider all of these issues when drafting any allocation policy for the site. Where necessary, site allocation can feature specific thematic issues that covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.

Site no.	Site name	Summary	Response
		<ul style="list-style-type: none"> <li>Huge basements which remove water retention capacity of land</li> </ul> <p>Peat reserves are likely to be in the Lye Valley leading down from the NOC and Windmill Road/Old Road junction, these must be protected from being washed away.</p>	
042	Nuffield Orthopaedic Centre	<p>BBOWT - Any development on this site is of the utmost concern with respect to the Lye Valley. Any development on existing urbanised surfaces will still need a whole suite of measures to ensure there is no impact on the SSSI and LWS. It is on surfaces that are currently green and free draining that any development would have the most impact on the hydrology of the meadow through reducing the evening out effect that such green surfaces have on the amount of water flowing into the fen, which is particularly vulnerable to severe and permanent damage from short-term very high water flows. This matter is well dealt with in the detailed study in the evidence library on the Lye Valley and there is no need for us to expand on it here. Development on green surfaces also may well lead to less water flow during dry periods causing the fen to dry out, and impacts on water quality which also can have a highly negative impact on the fen. In our opinion therefore no development on currently green surfaces should take place on this site.</p>	<p>The site allocation policy in the draft Regulation 19 plan identifies that the site falls within the impact risk zone for the Lye Valley SSSI. Any proposals for development on the site would need to demonstrate that there would be no impact upon the Lye Valley SSSI.</p>

## 43 - Old Road Campus

Site no.	Site name	Summary	Response
043	Old Road Campus	<p>Local Plan must include a site allocation policy for this site.</p> <p>Given the site's proximity to the Churchill Hospital Site (SHLAA Ref: 012), the issues affecting the site will be the same and can be summarised as follows:</p> <ul style="list-style-type: none"> <li>• Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs</li> <li>• Onsite Parking</li> <li>• Creating increased demand for housing</li> </ul> <p>Huge basements which remove water retention capacity of land</p>	<p>This site is no longer being taken forward as a site allocation. There are no vacant plots and any future redevelopment proposals at the site can be assessed against the wider suite of policies in the plan.</p>
043	Old Road Campus	<p>BBOWT - Any development on this site is of the utmost concern with respect to the Lye Valley. Any development on existing urbanised surfaces will still need a whole suite of measures to ensure there is no impact on the SSSI and LWS. It is on surfaces that are currently green and free draining that any development would have the most impact on the hydrology of the meadow through reducing the evening out effect that such green surfaces have on the amount of water flowing into the fen, which is particularly vulnerable to severe and permanent damage from short-term very high water</p>	<p>This site is no longer being taken forward as a site allocation. There are no vacant plots and any future redevelopment proposals at the site can be assessed against the wider suite of policies in the plan.</p>

Site no.	Site name	Summary	Response
		<p>flows. This matter is well dealt with in the detailed study in the evidence library on the Lye Valley and there is no need for us to expand on it here. Development on green surfaces also may well lead to less water flow during dry periods causing the fen to dry out, and impacts on water quality which also can have a highly negative impact on the fen. In our opinion therefore no development on currently green surfaces should take place on this site.</p>	

Oxfordshire County Council

Site no. and name	Summary of comment	Response	Outcome
043 – Old Road Campus	<p><b>Landscape and Nature Recovery – Biodiversity</b></p> <p>This site is considered likely to have a negative impact on Boundary Brook OxCityWS and therefore contrary to policy G6.</p>	We will consider how to reflect this in the allocation policy.	<p>Oxford City Action:</p> <p>Consider ecological impacts of development and where negative impacts are likely, propose</p>

Site no. and name	Summary of comment	Response	Outcome
			suitable policy wording to mitigate.

#### 49 - Oxford University Press Sports Ground, Jordan Hill

Site no.	Site name	Summary	Response
049	OUP Sports Ground	Do not allocate due to lack of green space and proximity to the river. Sports pitches are used by the community.	The draft policy requires reprovision of pitches, which is most likely to be by significant retention on site.
049	OUP Sports Ground	BBOWT disagree with the site allocation as it is in the Oxford Green Infrastructure Network. Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	It is agreed that the green space does have important functions, but it is not agreed that these justify full protection of the site because there is a reasonable prospect a solution can be found to ensure reprovision of the green infrastructure functions of the site, which may well be reprovision within the site itself, with enhancements of quality.

#### 54 - Ruskin College Campus

Site no.	Site name	Summary	Response
054	Ruskin College Campus	The site should remain restricted to college-only uses. The Old Headington Roads are already overloaded and could not cope with other types of development. More on-site residential accommodation for the college reduces pressure elsewhere.	The site is expected to remain as a college campus, with student accommodation and the allocation policy in the draft Regulation 19 plan reflects that.
054	Ruskin College Campus	BBOWT object to site allocation.	Noted

#### 61 - Union Street Car Park and 159–161 Cowley Road (formerly Union Street Car Park)

Site no.	Site name	Summary	Response
061	Union Street Car Park	We are concerned about the loss of the car park as it is an important amenity for local businesses and its loss would put further pressure for parking on streets leading off Cowley	It will be a requirement in the policy that any development retains car parking on site at a sufficient level – as determined by relevant officers

Site no.	Site name	Summary	Response
		Road, including obstructive pavement parking. However, in its favour, it is clearly brownfield land.	in the City Council - to support the district centre.
061	Union Street Car Park	This provides an important open space between developments. Building on it would create a more claustrophobic area. The existing buildings should be redeveloped instead.	Surface level parking is not an efficient use of land. General policies in the plan ensure high quality design that is not overbearing to its neighbours.
061	Union St Car Park	<p>(refers to LP2040 Policy)</p> <p>There aren't any trees on the southern boundary.</p> <p>Policy is ineffective and is unjustified. There is no data to support the allocation. The reduction of car parking seems difficult to achieve without a severe economic impact on the Cowley Road District Centre. Car park is often at or near capacity. The allocation of this site would therefore be contrary to Policy C2, Maintaining Vibrant Centres.</p> <p>There is no rationale given for the allocation of this site.</p> <p>Modification requested:</p>	<p>The site is being considered for inclusion in the plan as an allocation because of developer interest in delivering residential units, and the sustainable location in the district centre.</p> <p>It will be a requirement in the policy that any development retains car parking on site at a sufficient level – as determined by relevant officers in the City Council - to support the district centre.</p>

Site no.	Site name	Summary	Response
		A study should be undertaken to determine best use of site before the site is allocated/ prior to new policy being developed.	

## 62 - University of Oxford Science Area & Keble Road Triangle

No comments.

## 63 - Warneford Hospital

Site no.	Site name	Summary	Response
063	Warneford Hospital	<p>Site allocation policy must be drafted in a way that addresses the following key issues:</p> <ul style="list-style-type: none"> <li>• Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs</li> <li>• Onsite Parking</li> <li>• Creating increased demand for housing</li> <li>• Huge basements which remove water retention capacity of land</li> </ul>	<p>Site allocations can feature specific thematic issues that covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.</p>

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
063	Warneford Hospital	Warneford Hospital is currently allocated within the Oxford Local Plan 2036 as Policy SP22. The Trust submitted a hybrid planning application for the development at Warneford Park in July 2025, and the planning application has been submitted in accordance with the adopted policy. The Trust continue to support the allocation of Warneford Hospital as it is expressed in the current Local Plan and request that it is carried through into the 2042 Regulation 19 Local Plan. We agreed a Statement of Common Ground with you in March 2024 substantially to that effect. The Trust look forward to engaging further with OCC at the next stage of the Local Plan consultation.	Comment noted.
063	Warneford Hospital	Object if parking for cars is not strongly restricted in line with other transport and environmental policies.	Development of all sites must be in line with the general policies of the plan.
063	Warneford Hospital	This site contains a playing field that may be needed for the community.	The playing field has never been used by the community, and would not be expected to be suitable for general community use, being in a residential mental health hospital.

Site no.	Site name	Summary	Response
065	West Wellington Square	This site was not included in the site assessment.	A Sustainability Appraisal and Site Capacity Assessment have been carried out for this site.

#### **70 - Island Site (Park End Street/Hythe Bridge Street)**

No comments.

#### **75a, 75b - Oxford Railway Station and Becket Street Car Park**

Site no.	Site name	Summary	Response
075 (a and b)	Oxford Railway Station and Becket Street Car Park	Whilst we understand that the site allocation policies are being developed ready for the next stage of consultation, we note that the OLP2042 proposed site allocations map includes the 2.56 acre 'Oxford Railway Station and Becket Street Car Park' site (Ref: 075a/075b). The map identifies the site as being 'Suitable for a mix of uses, including retail, residential, community and commercial uses'. Network Rail welcome the proposed mix of acceptable uses but would advocate for hotel, education and student accommodation uses to be added to the list of	Given the site's location within the city centre, a range of uses are appropriate, including hotel, and student accommodation uses. The plan contains specific policies supporting both uses within the city centre. The site allocation policies should be read alongside the rest of the plan. The Western Entrance area at

Site no.	Site name	Summary	Response
		permissible uses during the next round of plan-making. Network Rail would also support the inclusion of the proposed Western Entrance area at Oxford Railway Station to be included within the boundary of any future Site Allocation.	Oxford Railway Station is currently under construction. As planning permission has been granted for the current scheme (which is not yet complete) rather than include the Western Entrance area within a site allocation, we will look to make a small alteration to the city centre boundary to include the Western Entrance area within it. We will also look to make a corresponding amendment to the West End Area of Focus boundary to include the Western Entrance area within it.
075 (a and b)	Oxford Railway Station and Becket Street Car Park	Oxford must have a combined bus and coach station, and it would ideally located here.	Masterplanning work on the station will look at optimising opportunities for seamless interchange.

## 76 – Oxpens

No comments.

## 81 - Worcester Street Car Park

Site no.	Site name	Summary	Response
81	Worcester Street Car Park	Canal basin should be recreated, perhaps with a small amount of residential accommodation.	There is no longer an operational need for the canal basin in this location.
81	Worcester Street Car Park (Nuffield sites)	This should not be housing, but a hotel or public building around a restored canal basin.	A mix of uses is across the three Nuffield sites in the West End (which are one site allocation policy), including housing.

## 104 - Former Iffley Mead Playing Field

Site no.	Site name	Summary	Response
104	Former Iffley Mead Playing Field	Do not allocate. Site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford). Also, site is in close proximity to SSSI. Heritage and amenity must be preserved.	The site is private and not in public use. The site allocation policy acknowledges the site's proximity to the Iffley Meadow's SSSI and the Iffley Conservation Area. It also identifies that there is archaeological potential on the site

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
			and potential for the site to impact views from the Rose Hill View Cone. Development of the site would include a requirement for the provision of public open space.
104	Former Iffley Mead Playing Field	Agree because it's a brownfield site and outside the conservation area, but this and Court Place Gardens is bringing significant numbers of new homes to a small area that couldn't then support any more (e.g. Land at Meadow Lane- which should not be developed).	Comments noted.
104	Former Iffley Mead Playing Field	This is an existing playing field.	The site is a disused playing field. At Examination of the Oxford Local Plan 2036, the Inspector concluded that the site was surplus to requirements as it had only ever been attached to the school, which had moved and not used it for many years.
104	Former Iffley Mead Playing Field	Much previous opposition to LP 2042 development advocated re-allocating the homes designated for the Oxford CC-owned LP 2042 to Oxfordshire CC-owned field Iffley Mead, just outside the Conservation Area. This 2 Ha site is designated in the OCC <i>Local Plan to 2036</i> for 90 homes at an even higher density, and with much more problematic	Policy SP38 of the adopted Local Plan 2036 seeks a minimum of 84 homes for this site. The site allocation policy in the Local Plan 2045 also seeks a minimum of 84 homes. There are no proposals to

Site no.	Site name	Summary	Response
		vehicle access, than LP 2042, so increasing the number of homes on Iffley Mead by 36% would be both administratively impractical and permanently impair amenity for both its new residents and those of adjoining streets, including the recently enlarged Iffley Academy Special School. Displacing a 'problem' onto a neighbourhood less able or willing to protest effectively cannot be conducive to social cohesion.	reallocate any homes from elsewhere onto this site.

#### **111 - Oxford Stadium (former Greyhound Stadium)**

Site no.	Site name	Summary	Response
111	Oxford Stadium	Strongly support the inclusion of the stadium for a comprehensive redevelopment.	Because the site is currently in use for uses important for the community, and redevelopment could not feasibly take place alongside this, the site is not taken forward in the draft Regulation 19 Plan.

#### **113 - Redbridge Paddock (land east of Redbridge Park and Ride)**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
113	Redbridge Paddock	Do not allocate. Site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford). Heritage and amenity must be preserved.	General policies of the plan guide all of these topics. Development of the site would include a requirement for provision of public open space, biodiversity considerations such as the Local Nature Recovery Strategy, as well as heritage.
113	Redbridge Paddock	Support for allocation.	Noted.
113	Redbridge Paddock	Development on the site is a good idea, but the river frontage should be kept open and buildings should not be too tall.	General policies of the plan guide design decisions about building heights. the site allocation policy also includes a requirement for a green buffer along the river bank.
113	Redbridge Paddock	The site was a special place to visit- where have the horses gone?	The site does not officially have public access, although it can be viewed from the surrounding roads. Uses for grazing horses is a matter beyond the local plan.
113	Redbridge Paddock	The site is important for biodiversity and as a wildlife corridor and the green space should be protected.	The requirement for biodiversity net gain means that there should not be a loss of biodiversity overall. The general policies of the draft plan and

Site no.	Site name	Summary	Response
			the site allocation policy require high quality green features to be designed into the development.
113	Redbridge Paddock	<p>BBOWT – strongly object to site allocation. BBOWT have commented on this site before. It forms part of the Oxford Green Infrastructure Network. Whilst the proposed allocation site is not subject to a nature conservation designation it has considerable conservation interest (e.g. orchids, otter, kingfisher). It is also located adjacent to the nationally designated Iffley Meadows SSSI, which BBOWT manages. The SSSI is a fragile site comprising lowland grassland, which suffers under increased pressure from visitors. This site allocation raises concerns with regard to indirect impacts on the SSSI by affecting hydrological flows, increased disturbance, and nutrient enrichment etc. BBOWT use grazing animals to manage the SSSI, which is essential to maintain this important habitat, however, there is a real risk that increased disturbance and indirect recreational pressure might make the management of this site untenable over time, resulting in the decline of the site. We oppose this allocation as it does not adequately protect the SSSI.</p>	<p>The local plan evidence base includes reviewing Green Infrastructure network and protected sites, including SSSI.</p> <p>The SSSI is separated from the site by a watercourse, which reduces the potential for direct and indirect impacts, including visitor pressure. The SSSI site is not directly or easily accessed from the development site. Nonetheless the site allocation does highlight that the site is within the identified impact risk zone for the SSSI and any proposals must demonstrate no adverse impacts, including considering surface water and groundwater flows.</p> <p>The latest GI assessment identifies the site as Supporting GI, so</p>

Site no.	Site name	Summary	Response
			enhancement will be required to mitigate any losses.

### 117 - Land surrounding St Clement's Church

Site no.	Site name	Summary	Response
117	Land surrounding St Clement's Church	This should deliver strong public benefit in terms of increased access and retaining elements of the existing rural character.	Agreed, and the draft site allocation policy attempts to ensure these things.
117	Land surrounding St Clement's Church	At present, I look out from the back of my house directly on to the church. Concerns include invasion of privacy for my home as well as disruption to diverse wildlife currently dwelling on that land behind the church and leading down to the river such as voles, badgers, bats, foxes. It is also part of the floodplain that reaches over Angel and Greyhound Meadow. Any construction will have a detrimental effect on this, including the drainage infrastructure. The church will become virtually an island in the middle of a housing estate if these plans go ahead. This is one of the few remaining ancient parts and protected sites of Oxford. My haven of a garden would, like the church, be swallowed up in a housing estate.	Policies of the plan aim to ensure sufficient privacy of new and existing occupiers, and the site allocation policy acknowledges the closeness of existing dwellings to the site in this location. The site allocation policy is clear that there are potential wildlife impacts that would need to be investigated, relatively low densities are likely to be necessary, and green areas will need to be retained and enhanced

Site no.	Site name	Summary	Response
			on the site, including between the church and the river.
117	Land surrounding St Clement's Church	No mention is made of foxes, deer and squirrels that visit the site. Nuthatch, magpies, green and greater spotted woodpeckers, great, blue and long tailed tits also visit the site. Therefore, the biodiversity should be improved, rather than habitats destroyed. Marston Road floods when it rains.	These are not protected species and will be able to find habitats all along the river corridor. Full biodiversity surveys will be required as part of any detailed planning application.

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #117 Land at St Clements	Site assessment for proposed allocation St. Clement's Church does not appear to acknowledge proximity to a Grade I Registered Park and Garden.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

120 – Unipart

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
120	Unipart	<p>The policy SP 8 reserving this site solely for employment use was written in 2016 and since then nothing has changed in any meaningful way - most of the site is either used for vehicle parking or open-air storage. It has been like that since the Pressed Steel Plant closed 40 years ago. It represents a failure to redevelop what is effectively a Brownfield site and a large one. The Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.</p>	<p>The land owner has stated a clear intent to develop the site during the plan period.</p>

#### **124 - Slade House**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
124	Slade House	<p>It is envisaged that the Trust will continue to provide statutory healthcare services from this site subject to the outcome of our estates strategy review referenced above. In turn, the Trust also welcomes the housing allocation; however, it may also seek to develop an element of private residential accommodation in addition to the employer-linked affordable component. It would also not wish to exclude other complementary uses on the site including improved health</p>	<p>Comments noted and reflected in the wording of the draft site allocation policy.</p>

Site no.	Site name	Summary	Response
		care facilities, associated administrative functions and extra care or student accommodation.	
124	Slade House	<p>This site has too much surface level parking on-site. It includes an important green space that should be preserved.</p> <p>Policy needs to address the key issues linked to this site (summarised as follows):</p> <ul style="list-style-type: none"> <li>• Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs</li> <li>• Onsite Parking</li> <li>• Creating increased demand for housing</li> <li>• Huge basements which remove water retention capacity of land.</li> </ul> <p>A footpath used to run from Horspath Driftway to the current ring-road and is still present for much of its length, although it seems householders have blocked this off, this should be reopened.</p> <p><i>(refers to LP2040 Policy)</i></p>	<p>Site allocations can feature specific thematic issues that covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.</p>

Site no.	Site name	Summary	Response
		<p>No statement regarding how extra staff will be managed.</p> <p>Greenfield runoff rates must be achieved.</p> <p>Green spaces must be marked on Policy Map and preserved.</p>	

#### **144e Marston Paddock extension**

Site no.	Site name	Summary	Response
144e	Marston Paddock extension - Green Belt assessment	<p>The full 2023 Green Belt assessment has not been made available for comment under the Evidence Base and Supporting Documents section of the consultation website or anywhere else on the Council's website. It has therefore not been possible to review the full 2023 assessment against the new requirements of the December 2024 NPPF (with reference to site 114e).</p>	<p>An updated Green Belt assessment, with methodology reflecting the NPPF, was published at Regulation 18, alongside the 2015 and 2017 assessment.</p>

#### **173 - Bayards Hill Primary School Part Playing Fields**

Site no.	Site name	Summary	Response
173	Bayards Hill Primary	Do not allocate this site as Barton:	This site is no longer being taken forward.

Site no.	Site name	Summary	Response
	School Part Playing Fields	<ul style="list-style-type: none"> <li>Is the most green-space-deprived suburb in Oxford, Barton Park even worse</li> <li>Will be surrounded by Land North of Bayswater Brook development (1500 houses)</li> <li>Will lose green space and add residents via the Sandhills Field Development (150 houses)</li> </ul> <p>Inclusion of this policy would be ineffective as</p> <ul style="list-style-type: none"> <li>this site is too close to the A40 for health</li> </ul> <p>There is nowhere to provide re-provision of this green space in Oxford</p>	

#### **204 - East Oxford Bowls Club and 665 Oriel College Sports Ground and adjoining land (comprising of 263 and 639)**

Site no.	Site name	Summary	Response
204	Former East Oxford Bowls Club	<ul style="list-style-type: none"> <li>As a sports facility, this should be protected from development.</li> </ul>	This is a small site previously used as a bowling green but it has been out of use for many years.
204	Former East Oxford Bowls Club	DRARA would like to see this run down empty site restored to beneficial use, but not necessarily for	The site is undoubtedly sensitive in terms of the potential impact

Site no.	Site name	Summary	Response
		<p>housing. The site is not identified as green infrastructure but perhaps it should be.</p> <p>The site is in the ownership of Oriel College and in recent years has become run down and affected by scrub regeneration, fly-tipping and anti-social behaviour. Despite these factors it still makes a positive contribution to the Bartlemas Conservation Area by helping to maintain the rural character and seclusion of the Area, acting as a green buffer along its Cowley Road edge, effectively marking the limit of Victorian Oxford. If intensively developed these benefits to the Conservation Area would be lost. In addition we note that the site is covered by policy HD9 View Cones so it is sensitive to any tall development.</p> <p>In our view a relatively low key community use for this site would be best – perhaps returning the site to use as community sports facilities, a community garden or play area, or even an extension to the very popular allotment site next door. If it is to be allocated for development, high density development in our view would be inappropriate. A use such as low rise specialist accommodation for the elderly with a generous amount of green space might possibly be accommodated, given very sensitive design.</p>	<p>of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets, and should respond carefully to that.</p>

Site no.	Site name	Summary	Response
		<p>Any change of use or development should retain the strong hedgerow cover next to Cowley Road so that the sense of a green oasis survives. The tests set out in Policy HD1 need to be applied very carefully to protect and enhance the character of the Conservation Area, including the quiet rural, hedged character of Bartlemas Lane, views to and from the historic hamlet and its Listed Buildings, dark skies, and the privacy and visual amenity of the neighbouring allotment site.</p>	
204 and 655	Oriel College Sports Ground, Bartlemas and former Bowling Green	<p>Great care needs to be taken with regard to the proposed development of these sites and the potential impacts on the setting of the Bartlemas Conservation Area.</p> <p>Should the adjoining sports grounds be allocated for development, detailing guidance should be provided within any relevant policies to ensure that the unique historic character of the Conservation Area is unharmed and unaffected. It should also be made clear that no intensification of traffic along Bartlemas Lane would be acceptable due to the proximity of sensitive historic buildings.</p> <p>A buffer should be left to the Bartlemas access lane to avoid affecting its character.</p>	<p>The site is undoubtedly sensitive in terms of the potential impact of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets, and should respond carefully to that.</p>

Site no. and name	Summary of comment	Response	Outcome
Site #665 inc #663 and #204 Oriel College Sports Ground, Bartlemas and former Bowling Green	Needs very careful consideration, including heritage impact assessment (HIA). Careful consideration is needed of the potential impacts of all associated development, including access to the site.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

#### 289 - Sandy Lane Recreation Ground

Site no.	Site name	Summary	Response
289	Sandy Lane Recreation Ground	Objection: Do not progress this site as next to Cowley and East Oxford (areas of the city with the lowest amount of green space per inhabitant in the city). This land is needed for an increasing population (in the city) and any replacement sport facilities from Cowley/Littlemore.	Reprovision of sports facilities would be required.
289	Sandy Lane Recreation Ground	The Sandy Lane campaign objects to the inclusion of any recreation grounds on the local plan without paying proper heed to the requirements of the NPPF. The campaign will challenge the inclusion of Sandy Lane Recreation Ground as a development site when this plan goes to inspection.	Reprovision of sports facilities would be required, in accordance with the NPPF.

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
289	Sandy Lane Recreation Ground	BBOWT disagree with the site allocation as it is in the Oxford Green Infrastructure Network. Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	It is agreed that the green space does have important functions, but it is not agreed that these justify full protection of the site because there is a reasonable prospect a solution can be found to ensure re-provision of the green infrastructure functions of the site.

### **389 - Land at Meadow Lane**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
389	Land at Meadow Lane - Weight of objections	The weight of opposition from public and other stakeholders means the site should not be allocated.  There are objections from:  Environment Agency  Oxford Preservation Trust  BBOWT  Cyclox	What needs to be considered for the local plan is whether there is potential for a scheme to come forward that is acceptable in the context of national policy and of the Plan's proposed strategy and detailed policies. Moreover, what is relevant with objections is not the sheer number of objections, but whether a material issue is raised that informs the detailed drafting of

Site no.	Site name	Summary	Response
		<p>As well as from over 1,000 respondents in the OxPlace January 2023 consultation and 50 comments to the OLP2042 Early Engagement Survey/ These responses highlight cross-cutting themes and many and varied reasons the site should not be developed. The community should be listened to and to override them would be an abuse of power, especially as the council has asked the public for input and has said they will listen to them.</p> <p>Suitable and compatible uses, such as a 'Meadow School' for outdoor education should then be discussed with local schools and communities</p>	<p>the policy or that shows this is not possible. The objections to the planning application relate to that application. The application is not yet determined, but even if it is turned down as not suitable, that does not necessarily mean that there is not potential for a suitable scheme to come forward.</p>
389	Land at Meadow Lane - Heritage	<p>Harm to the Iffley Conservation area. The sites lie within the Iffley Conservation area. Because of this the National Planning Policy Framework confirms that it is a heritage asset and places a large number of obligations on Local Planning Authorities. Policy HD1 Conservation Areas states that 'substantial harm to ....a conservation area should be wholly exceptional.' This is not addressed. Also, this ancient meadow, fully within the Iffley Conservation Area is bordered by an ancient drover's route.</p> <p>There are Two Grade II Listed Buildings (Tudor Cottage and Townsend Close) and a Grade II Listed Wall (Wall and Gate of Townsend Close) nearby. Road improvements and urbanization along Meadow Lane and Church Way will affect</p>	<p>The site is undoubtedly sensitive in terms of the potential impact of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets, and should respond carefully to that. The policy is clear on this requirement.</p> <p>Many sites in Oxford have archaeological potential. That does not preclude development, but</p>

Site no.	Site name	Summary	Response
		<p>the setting of these heritage assets. Not addressed by the Council.</p> <p>There is archaeological potential</p> <p>The site is within the view cone</p> <p>There are unevidenced changes in the description of Iffley Village, whereas the 2009 Conservation Area Appraisal was subject to thorough consultation</p>	<p>policies do require care, similarly to the View Cone.</p>
389	Land at Meadow Lane - biodiversity	<p>It is unsuitable according to the assessments of OCC and OxPlace themselves in respect of damage to current high biodiversity. It should be designated as an OCWS adhering to the Council's own biodiversity assessment.</p> <p>Local Nature Recovery Strategy (LNRS highlights this site for nature recovery)</p> <p>There are badgers present on the site.</p>	<p>The identification of a site as having potential for nature recovery does not preclude the site from development.</p> <p>General policies of the Local Plan do require that the mitigation hierarchy is followed, and Biodiversity Net Gain is also required.</p>
389	Land at Meadow Lane - flood risk	<p>Damage identified in the Flooding Risk Assessment.</p> <p>Conflicts with national policy by not applying the sequential test (to compare with other potential sites with lower flood risk). NPPF (para 172) and the PPG.</p> <p>Disturbance to the drainage of the site and the risk of problems as a result of building on the edge of the floodplain.</p>	<p>The FRA referred to relates specifically to the proposed development in the planning application. A Level 2 SFRA has been carried out to support allocation of the site in the Local Plan. That assesses whether it is likely a development that passes the</p>

Site no.	Site name	Summary	Response
			exceptions test could come forward. The Level 2 SFRA did not suggest this wasn't possible. The flood risk sequential test will be published alongside the Local Plan for the Regulation 19 consultation.
389	Land at Meadow Lane - sewage	<p>Problems of ensuring adequate sewage disposal. The Environment Agency has had to put a stay on all Oxford development because of the failures of its sewage disposal routes. This is still not rectified. Piling more pressure onto it will make it worse.</p>	Adequate sewage disposal is important, but there is no reason to think this is not achievable on this site. Thames Water have adequate proposals for the upgrade to the sewage treatment works and there is not a blanket restriction on development.
389	Land at Meadow land -access and transport	<p>It will harm the Principal Quiet Route for Active Travel. The site will add substantial traffic onto a designated Quiet Route that is much used for journeys to and from Oxford. This is crazy and unsafe.</p> <p>Parking is frequent flashpoint for confrontation and competition between established and new residents for street parking, now regulated by the recently imposed CPZ, which may lead to disputes. LP 2042 development must include sufficient parking for all its residents. It's a pity the planners succumbed to pressure to delete from the 2021 scheme the pairs of purpose-built parking places on the SW side of Meadow Lane.</p>	<p>The change in the details of the planning application in relation to parking spaces relate to the details of the proposals, and not the in-principle suitability of the site for parking.</p> <p>It is considered that the site can be accessed safely within minimal negative transport requirements.</p> <p>Meadow Lane is identified as an on-road quiet route in the LCWIP, but so are many other routes in Oxford that have significantly more</p>

Site no.	Site name	Summary	Response
		<p>hazard along the Meadow Lane site will be caused by severely increased two-way traffic.</p> <p>This will urbanise the route and harm the Conservation Area</p>	development alongside than Meadow Lane, even if development takes place on this site.
389	<p>Land at Meadow Lane- SA</p> <p>SA</p>	<p>The grading system used to indicate positive, negative or neutral impact, has been manipulated and upgraded when addressing many aspects of the proposed development – to less negative, more positive or neutral.</p> <p>Size: The total size is incorrectly shown as 0.99ha when it should be 1.5ha;</p> <p>Use: it has not been a ‘pony paddock’ for many years</p> <p>Objective 1 - Building on this greenfield site WOULD have high carbon costs, both from actual building work and from loss of carbon storage in the earth of this hitherto uncultivated meadow.</p> <p>Objective 2 - Regarding flood zones, the SA OMITS information from the LP2036 which states that 7% of the site is in Flood Zone 3b with additional land within FZ2.</p> <p>The flood testing has not been carried out correctly, by not applying the sequential test as required by government policy.</p> <p>Objective 3 - Reference to the site as ‘unprotected open space’ omits the fact that is it UNDEVELOPED open space. Further, this greenfield site has great biodiversity value and qualifies as an Oxford City Wildlife Site. No explanation as to why it is graded orange or what efforts to avoid its use has been made. Should be red.</p>	<p>The SA Framework (“grading system”), was developed in consultation with Natural England, the Environment Agency and Historic England. It provides a standardised approach for assessing the development potential for all sites. Each site has been considered in relation to the each of the SA Objectives and scored according to the SA Framework, taking into account additional information, where appropriate.</p> <p>Size: the correct site size is 0.99ha and this will be corrected on the SA form for the Regulation 19 consultation.</p> <p>Objective 1 The assessment is applied in the standard way.</p> <p>Objective 2 The flood zone information uses the most recent (2025) mapping from the</p>

Site no.	Site name	Summary	Response
		<p>Objective 4 – Numbers: not a material number. AH: There is no definition of ‘affordable’ housing; nor evidence given as to why this site is ‘likely’ to be policy compliant. Doubt it will be affordable housing.</p> <p>Objective 7 Public Open Space, the site is NOT in private ownership!! The Council bought it with taxpayers’ money. It is public land. PUBLIC SPACE: The site is owned by the City Council and therefore not in private ownership as they state. It is not used for animal grazing. Such references indicate no renewed assessment but reliance on the outdated and flawed LP2036 assessment. The community access the land for scything to manage biodiversity as the Council have failed to mow the meadow despite their obligation as landowner to do so.</p> <p>Objective 8 No mention of the key Quiet Route of Meadow Lane which is well used every day for Active Travel. Under Objective 8, there are several errors. The bus stop, railway station, post office and schools are all further than is stated. Bust stop should not be green. The services are only 3, 3A, ST1. That is misleading. Under ‘Post Office’ it contains repeated information about the GP surgery.</p> <p>Objective 9 – Water. Incorrect information given. There IS a watercourse adjoining the site, which flows into the Thames and will be impacted by sewage and wastewater discharges.</p>	<p>Environment Agency. The flood risk sequential test is not part of the SA process, but a key part of planning has been carried out to inform the next stage of the plan.</p> <p>Objective 3 The orange grading aligns with the scoring system. The site is not a designated Oxford City Wildlife Site. The SA simply reports this.</p> <p>Objective 4 There is nothing to suggest the site could not or would not deliver the standard required amount of affordable housing.</p> <p>Objective 7 There is no public access to the site, so it is private and not public open space. The site was last used as a horse paddock, but the description will be updated.</p> <p>Objective 8: These measurements on the form have been reviewed and updated for the next stage of consultation.</p>

Site no.	Site name	Summary	Response
		<p>Objective 10 The site is rich in biodiversity and would be hugely negatively impacted by development. It lies along three of Oxford's wildlife corridors (see Oxford City Green Infrastructure Study). It is also notable that the Council's regular Biodiversity Net Gain offsite partner has withdrawn support re this site, because of the biodiversity value cited by several Statutory Consultee wildlife organisations.</p> <p>Objective 11 – It is in the Iffley Conservation Area and should never have been allocated: Policy HD1 Conservation Areas states that “substantial harm ... to a conservation area should be wholly exceptional..”</p> <p>Regarding the designation of a ‘Historic Core Area.’ The Council states “Not within a historic core area.” Which contradicts what they say under archaeology, where the site is (correctly) stated to be “located within the historic core of the medieval Village. There ARE listed building implications, especially for the wall and gate of Grade II listed Townsend Close. Road improvements and urbanisation along Meadow Lane and Church Way will affect the setting of these assets.</p> <p>Objective 12- diversifying the economy and employment opportunities. Fails to identify the importance of Iffley as contributing to culture/leisure/visitor sector (e.g. circular walk on Quiet Route). Should be orange.</p> <p>Access constraints. Council assessment says access via Church Way. Development proposals give the main access off Meadow Lane.</p> <p>Says surrounding uses are residential but to the west they are not.</p>	<p>Objective 9: This has been reviewed and updated for the next stage of consultation.</p> <p>Objective 10: The SA scoring undertaken at Reg. 18 has regard to the findings of the ecological assessments (undertaken to support planning application), while reflecting the position that no formal ecological designations are present. Given the ecological considerations present at the site, a suite of mitigation measures are proposed for the site.</p> <p>Objective 11: Location within a conservation area does not mean that development cannot happen. A conservation area is not an area where no new development can occur such that it remains exactly as it was when it was designated. Each conservation area has special characteristics that should not be harmed and that proposals should be informed by and respond to to preserve that special character. It is considered that development on this site can achieve that. The Historic</p>

Site no.	Site name	Summary	Response
		<p>The Stage 2 Conclusion is erroneous: for example, badgers and invertebrates cannot simply be dealt with 'in the policy and at the application stage'. That sounds as if it is possible to make this totally unsuitable site suitable simply by careful policy wording.</p> <p>It is not a robust or evidence-led approach to carry forward an allocation simply because it was allocated in LP2036.</p>	<p>Core Area is a specifically designated area of the city, which is where the 'dreaming spires' are found and which has a policy applying specifically to that area.</p> <p>Objective 12: There is no reason that potential development of the site would have a negative impact on the economy or employment.</p> <p>It is considered that the site can be suitable with careful proposals that respond to the sensitivities of the site.</p>
389	Land at Meadow Lane	<p>Support for site allocation – site is suitable for affordable housing; the development of the site would benefit the village and conservation area creating greater social and economic diversity. Do not believe site should be designated an Urban Wildlife site or Local Green Space - there are many other sites locally that provide for this.</p>	Support noted.
389	Land at Meadow Lane	<p>Protests land being used for a small amount of residential housing but would support a school at Meadow Lane.</p>	Noted

Site no.	Site name	Summary	Response
389	Land at Meadow Lane	<p>Support (in the context of preference of this site over Iffley Mead)</p> <p>I regret the loss of farmland to urban development as much as anyone but understand that housing is urgently required and this site, with easy access to transport and employment, has much to offer. The Land at Meadow Lane LP 2042 has been closed to the public and leased for horse or sheep grazing for many decades and is mostly concealed behind hedges, so is inconspicuous to passers-by. At under 1 Ha, it represents only a tiny fraction of the large area of minimally cultivated land</p>	Comments noted.

#### 428 - Rectory Centre

Site no.	Site name	Summary	Response
428	Rectory Centre	<p>We welcome the intention to allocate the site for residential purposes, and we consider it is suitable for at least 21 dwellings. We do not consider redevelopment of the site should be restricted to the existing building height, and that there is scope to</p>	Support noted.

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
		increase height to match surrounding building heights along the Cowley Road. However, we recognise that the proposed height should respect the View Cone from Crescent Road. Health uses currently on the site would be provided, as necessary, elsewhere on other Trust sites in Oxford.	
438	Former Blanchford's Building Merchants	Surprised that the former Blanchford's building supplies depot in Headington is not listed. It should be investigated. It seems a prime site for development.	The site is included within the Strategic Housing Land Availability Assessment (SHLAA), which forms part of the evidence base for the Local Plan.

#### Historic England

<b>Site no. and name</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Site #428 Rectory Centre	Highlight the importance of ensuring any policy for this site's redevelopment embeds a realistic expectation of what would be delivered without significantly increasing the building height. Site falls directly within a view cone.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

#### 438 Former Blanchford's Building Merchants

Site no.	Site name	Summary	Response
438	Former Blanchford's Building Merchants	Surprised that the former Blanchford's building supplies depot in Headington is not listed. It should be investigated. It seems a prime site for development.	The site is included within the Strategic Housing Land Availability Assessment (SHLAA), which forms part of the evidence base for the Local Plan.

#### 439 - Marston Road Campus

No comments.

#### 440 - 1 Pullens Lane

Site no.	Site name	Summary	Response
440	Pullens Lane	Headington Hill has calcareous springs or surface water as map per below, showing TUFA, Fen and probable peat reserves in and around Headington Hill Park.  Modification requested:	More detailed capacity assessment work can't give enough certainty that the site may have a capacity more than 10, so no site allocation policy has been included in the draft plan.

Site no.	Site name	Summary	Response
		<p>Site allocation policies should include a requirement to undertake hydrological and fen survey, and recovery where possible.</p> <p>The intensification of development directly contradicts Headington Hill Conservation Area Appraisal which refers to, in Part 3, Pullen's Lane to loss of residential character, and tranquillity. There is simply no point having a Conservation Area if this sort of development is permitted.</p>	

#### 463 - Ruskin Field

Site no.	Site name	Summary	Response
463	Ruskin Fields	<p>The Site extends to c. 3.62ha and is entirely owned by Ruskin College (University of West London) with Welbeck Land in place as strategic land promoter and master developer (the Promoter). The Site has been identified as surplus to requirements by Ruskin College with disposal linked to generating capital for upgrading the college's facilities. The Site has been the subject of a comprehensive technical evidence base and consultation with OCC officers, which</p>	Noted.

Site no.	Site name	Summary	Response
		<p>has demonstrated there are no overriding constraints to the development of c. 130 homes with associated public open space, landscaping, infrastructure and access from Foxwell Drive.</p> <p>The Promoter can therefore confirm that Ruskin Fields is available, deliverable, and capable of providing c. 130 homes in the first five years of the new local plan period. The Site and proposals for residential development align with the Regulation 18 Local Plan Objectives and would support Oxford in the delivery of much needed homes in the first five years of the local plan. The Promoter intends to engage comprehensively with OCC and wider stakeholders as the Local Plan progresses to ensure opportunities for the Site are achieved alongside sensitive design and mitigation.</p>	
463	Ruskin Fields	<p>It is a supporting green space and has particular importance as part of the continuous green corridor from Dunstan Park in the west to Barton Triangle in the east. Loss of a green corridor can't easily be mitigated. The likelihood of peat deposits is extremely high.</p> <p>In addition, there are heritage impacts the green fields in this location provide the rural setting of the village.</p>	<p>The Regulation 19 plan puts forward the northern part of the fields only, leaving the southern part, where there is a pond, to remain as a wildlife corridor from west to east.</p> <p>The landowner has said the site is available and did not note legal</p>

Site no.	Site name	Summary	Response
		<p>If they are taken forward despite our concerns then we consider that a minimum of 50% of the land must be retained as green space (in addition to gardens within the urban development) including a variety of habitats including trees, and wetlands, which will benefit both wildlife and people.</p> <p>Land Registry title ON269207 records covenants restricting building on the fields.</p>	<p>issues. It is their responsibility to ensure there are no legal issues.</p>
463	Ruskin Fields	<p>The site (463) is incorrectly defined, as the southernmost field is already allocated under SP56 of Local Plan 2036.</p>	<p>Local Plan 2045 will supersede Local Plan 2036.</p>
463	Ruskin Fields – harms do not outweigh benefits and site previously dismissed	<p>Site is undeliverable and unjustified (its allocation does not meet S1 as the adverse impacts significantly and demonstrably outweigh the benefits). Any building here will destroy the value of Ruskin Fields. This development is unjustified. 2300+ houses have been consented for Land North of Bayswater Brook, meaning there is reduced need, and increased need for the amenity of the very short Stoke Place Lane to Headington. In 2012, the Ruskin Fields site (HELAA 463) was wholly rejected by the Planning Inspector as part of the Core Strategy and Barton AAP, the Site DPD 2012, Sustainability Appraisal and all parties (Labour/LibDem) in the Council. Remove the site from the Local Plan.</p>	<p>Without a detailed proposal it is not possible to understand either the benefits or harms or to weigh them up. However, it is considered that there is potential for a scheme where the benefits outweigh the harms. A different part of the field is allocated in the Oxford Local Plan 2036. The Inspector's comments quoted in the full response pre-date that.</p>

Site no.	Site name	Summary	Response
463	Ruskin Fields – provides views	Provides views in and out of the Conservation Area, especially from the Land North of Bayswater Brook development at Elsfield, and from Stoke Place to Elsfield.	These views are noted in the site assessment.
463	Ruskin Fields – green belt	It is effectively a green belt around Old Headington.	The site does not represent a belt around old Headington.
463	Ruskin Fields – traffic levels	Unacceptable traffic caused by development - Stoke Place is the last green lane in Old Headington. Usage as a cycleway or entrance to the development will destroy its charm and inflict substantial harm on the Old Headington Conservation Area. Traffic to and from the estate will not be sustainable Old Headington is already a major hospital rat-run. The proposed road access here would exacerbate severe traffic around the John Radcliffe Hospital.	It is agreed that Stoke Place is not suitable for vehicle access. It is not considered that the amount of pedestrian or cycle use that would be generated from this site has potential to destroy the character of the lane.
463	Ruskin Fields – flooding and SuDS	(Re G7) Downstream flooding off Headington Hill from the John Radcliffe and TW sewers down Osler Road to Barton Park below is already an issue and any development here will increase flood risk. (Re G8) The groundwater level is too high at the base of the development for a SuDS system to be effective so drainage will need to be via Bayswater Brook which	The potential for SuDS will need to be explored as part of any proposals, but it is not considered there are potential unmitigable flood risk, surface or groundwater concerns from potential development on this site.

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
		already has LNBB and Barton Park and other developments	
463	Ruskin Fields – carbon capture	(Re R2) Large peat deposits on adjacent fields perform a valuable carbon capture role and permit an ecology identical to that of the Lye Valley SSSI.	The potential for peat will need to be explored as part of this development.
463	Ruskin Fields – housing need unjustified, will cause harm to local residents	Housing need does not outweigh substantial loss of heritage, conservation, and amenity value. It is used by residents of green space deprived areas in Barton (soon to be surrounded by Land North of Bayswater Brook dev).	The Regulation 19 plan puts forward the northern part of the fields only, leaving the southern part, where there is a pond, to remain as a wildlife corridor from west to east. The site is not accessible to the public.

Historic England

<b>Site no. and name</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Site #463 Ruskin Field	Welcome direction of travel to undertake further investigation that informs next steps and help to understand the impact of the proposed development on the historic environment.	Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.	Update relevant info where applicable.

Site no. and name	Summary of comment	Response	Outcome
463 – Ruskin Field	<p><b>Landscape and Nature Recovery – Biodiversity</b></p> <p>This site is located within close proximity to Dunstan Park OxCityWS. Impacts to Dunstan Park OxCityWS should therefore be considered when assessing this site allocation against SA objective 10 and policy G6.</p>	We will consider how to reflect this in the allocation policy.	<p>Oxford City Action:</p> <p>Consider ecological impacts of development and where negative impacts are likely, propose suitable policy wording to mitigate.</p>

**467 - Edge of Playing Fields, Oxford Academy**

No comments.

**497 - MINI Plant Oxford**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
497	MINI Plant Oxford	<p>A more robust policy is required to reduce surface water runoff from the very large number of hard surfaces at this site. Particularly as the complex is close to the Oxford STW.</p> <p>Modification proposed: Reduction in surface runoff with SuDS etc.</p>	There is a general policy relating to SuDS, and it does not need to be repeated into each site allocation policy.

**516 - 474 Cowley Road (Former Powell's Timber Yard)**

No comments.

**574 - Manzil Way Resource Centre**

Site no.	Site name	Summary	Response
574	Manzil Way Resource Centre	This allocation should ensure sufficient consideration is given to the impact on adjoining housing. Any development should be small-scale.	Development would have to be appropriate to the scale and nature of the site and surrounding development.
574	Manzil Way Resource Centre	It is envisaged that the [Oxford Health NHS Foundation] Trust will continue to provide statutory healthcare services from this site subject to the outcome of our estates strategy review referenced above. In turn, the Trust also welcomes the housing allocation however, it may also seek to develop an element of private residential accommodation in addition to the employer-linked affordable component. It would also not wish to exclude other complementary uses on the site including improved health care facilities, associated administrative functions and extra care or student accommodation.	Comment noted.
574	Manzil Way Resource Centre	<p><i>(Local Plan 2040 policy is discussed in this response)</i></p> <p>The phrase “could be car-free” should be strengthened to “must be”</p> <p>Modification requested:</p>	The Regulation 19 draft plan policy wording is “any additional residential development should be low car”.

Site no.	Site name	Summary	Response
		Make a single statement that actually means anything or constrains anybody in any way. The “policy” is almost meaningless.	

#### **579 - ROQ Site**

No comments.

#### **586 - Osney Mead (whole site)**

Site no.	Site name	Summary	Response
586	Osney Mead	It needs to include residential use, even if it is just graduate accommodation.	The site allocation includes residential use.

#### **587 - ARC Oxford**

Site no.	Site name	Summary	Response
587	ARC Oxford	<p>Although some of this site has been built on there are areas which remain vacant and has done so since the 1990's when the old Rover factory was demolished. The rate of new build has slowed down completely, and the vacant sites are very much as they were in 2016 when Policy SP10 was written.</p> <p>The Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.</p>	<p>We maintain a regular dialogue with various stakeholders, including landowners. The landowner for this site has been working towards a planning application, which has recently been submitted (October 2025). This planning application covers the remaining vacant plots that do not already have planning consent.</p>
587	ARC Oxford	<p>Do not build on Green Infrastructure. Use contributions to make the site usable by the community from Cowley in particular.</p>	<p>Other policies in the plan specifically address the city's green infrastructure. These policies create a hierarchical evidence-based approach for the protection of the city's green infrastructure network. Developer contributions are often needed to fund a range of infrastructure requirements, including community infrastructure. Developer contributions must also meet specific</p>

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
			legal tests which govern their application.

#### 588 - Oxford Science Park (whole site)

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
588	Oxford Science Park	<p>The Local Plan recognises the importance of the 'Area of Focus' and Oxford Science Park in particular for employment purposes.</p> <p>The Local Plan Preferred Options consultation document recognises that there are significant regeneration opportunities throughout this area, with the ability to intensify and modernise the key employment sites. It also recognises the role that the opening of the Cowley Branch Line can play in improving connectivity to and from this area. EIT support the general approach advocated by the Local Plan for this area.</p> <p>The Oxford Science Park, and the Area of Focus more widely, has seen growth in recent years, but it is agreed that there is significant potential for development in this area.</p> <p>The masterplan work being undertaken by EIT is in general conformity with the approach advocated by</p>	Support noted. We keep an ongoing dialogue with various stakeholders, including landowners. As part of our Reg. 19 Plan preparation, we have subsequently met EIT representatives to discuss various aspects of the plan.

Site no.	Site name	Summary	Response
		the Local Plan consultation, but EIT would welcome further discussions on the specific policy requirements as the Local Plan progresses to the next stage.	

#### **613, 614, 615 – Botley Road sites around Cripley Road including River Hotel and Westgate Hotel**

Site no.	Site name	Summary	Response
613-615	Botley Road sites around Cripley Road including River Hotel and Westgate Hotel	Given the committed site allocations in the adopted Local Plan that include retail floorspace (Churchill Hospital / Diamond Place and Ewert House / Island Site / Oxpens / Osney Mead / Oxford Railway Station / Kassam Stadium) together with the planning permission at the Clarendon Centre, the potential new allocation inclusive of retail floorspace at the Botley Road sites around Cripley Road is questioned given the evidence of over-supply of floorspace for purposes within class E within the city centre, endorsed by lack of capacity for new retail and leisure floorspace evidenced by the Retail and Leisure Study.	The Reg. 18 consultation document sets out the land uses proposed by the landowner (rather than setting out a policy for the site). There is already an existing retail use at the site. The main use proposed at the site is residential. Any additional retail proposed through a planning application would need to demonstrate compliance with other policies in the plan, given the site's location, just outside the city centre boundary.
613-615	Botley Road sites around Cripley Road	The River Hotel is a much-loved historic building bringing a beautiful garden and green space to Botley	Consultation with the local community is required early in the

Site no.	Site name	Summary	Response
	including River Hotel and Westgate Hotel	Road. Much of the character of the area would be lost by demolishing these buildings. Consultation with the strong community of west Oxford is essential.	planning application stage. The buildings are not considered to be of the kind of significance that means that new development would or could not be preferable.
613- 615	Support	ChCh supports the future allocation of the following sites in its ownership: SHLAA Sites 613-615: Various buildings on Botley Road, Abbey Road, Cripley Road, Mill Street and Barrett Street; SHLAA Site 616: St Thomas School House and Osney Warehouse, Osney Lane.	Support noted.

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #613-615 Botley Road sites around Cripley Road	No site appraisal form published? There are heritage sensitivities that need to be considered, including impacts on the approach to Osney Town conservation area, and potentially wider views.	It appears this was erroneously missed off the published list.	We will ensure this is available for the next consultation.

#### 616 – St Thomas School and Osney Warehouse

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
616	St Thomas School and Osney Warehouse	<p>We have no in principle objections to the allocation of this site. However, the former St Thomas School building is Grade II listed and sufficient weight needs to be given to its retention and preservation within any forthcoming policy text. Built around 1870 the building is a good example of a late 18th-century school building, whilst also providing a remnant of the historical evolution of the evolution of the St Thomas's parish and those who lived there.</p> <p>A respondent asked us to contact them as they have detailed information on the history.</p>	<p>The site is undoubtedly sensitive in terms of the potential impact of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets and should respond carefully to that.</p>

Historic England

<b>Site no. and name</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Site #616 St Thomas School and Osney Warehouse	<p>Concur with comment on page 181 that the site possesses “heritage interest that needs further investigation”. This includes any impacts on character and appearance of the Central conservation area.</p>	<p>Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.</p>	<p>Update relevant info where applicable.</p>

## 624 - Land south of Frideswide Square

Site no.	Site name	Summary	Response
624	South of Frideswide Square	<p>The gateway from the west must be improved not destroyed and assume the historic Jam Factory is to be preserved.</p> <p>Wary of too much retail. City centre needs support. Failed retail in Frideswide Square. Buildings provide a distinctive and visibly C19th character to the station area.</p>	<p>The Jam Factory is a listed building and policies relating to design and heritage will ensure high quality development that conserves the Jam Factory. Active ground floor level frontage is important in this central location near the station, but there is not requirement for retail specifically.</p>

## 657 - Clarendon Centre

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #657 Clarendon Centre	<p>Clearly this an important site in the Central conservation area and close to numerous historic buildings, not least Carfax Tower, an important local landmark. Its central position means that it has significant potential to impact on the Oxford skyline, reflected in our comments on the proposed development that secured</p>	<p>Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.</p>	<p>Update relevant info where applicable.</p>

Site no. and name	Summary of comment	Response	Outcome
	planning permission last year. We would expect to see reference to these sensitivities in any associated allocation policy.		

**658 - Barton 3b (Land to the rear of Harolde Close, previously included in the Barton Area Action Plan area and outline application)**

Site no.	Site name	Summary	Response
658	Barton 3B (Land to the rear of Harolde Close)	<p>When Barton Park was built, the land was raised due to the extreme flood risk of building on a flood plain in the middle of a climate crisis.</p> <p>This had the effect of causing back-pressure on Bayswater Brook which means that the part of Barton Village Road as marked below along the stream is now flooded regularly.</p> <p>The stream going along the west side of the Site is partially culverted and has existed as a natural stream before as shown on early OS Maps, this floods in storm conditions and flows rapidly due to the steep slope to Bayswater Brook.</p>	No longer being taken forward as a site allocation

Site no.	Site name	Summary	Response
		Further, the site is now very overgrown with mature trees, and is a haven for wildlife, this would be contrary to all policies in the OLP2042 relating to green space, ecology and environment.	
658	Land off Harolde Close	Opposition to the plan to build on the green belt north of Bayswater Brook. I do not see this development as justified when other brownfield and city sites could be found for affordable housing. The wrecking of this prime green belt land is indefensible and is motivated by landowner and developer greed.	No longer being taken forward as a site allocation

#### 660 - 2 Harberton Mead

Site no.	Site name	Summary	Response
660	2 Harberton Mead	Possible green space loss and increase in run off must be addressed.	No longer being taken forward as a site allocation.

Historic England

<b>Site no. and name</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
2 Harberton Mead	Clearly this needs consideration with respect to any impacts on the character and appearance of Headington Hill conservation area.	Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.	Update relevant info where applicable.

#### **664 - Jowett Walk (South)**

<b>Site no.</b>	<b>Site name</b>	<b>Summary</b>	<b>Response</b>
664	2 Jowett Walk (South)	Concern over allocating even more land for student accommodation than already and therefore displacing other Oxford residents.	The site was put forward by the landowner as part of the Call for Site process.

#### Historic England

<b>Site no. and name</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Site #664 Jowett Walk (South)	Clearly this lies within the central conservation area and close to multiple listed buildings, so care is needed to respond sensitively.	Thanks for comment we will update where needed and	Update relevant info where applicable.

<b>Site no. and name</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
	<p>Site assessment published for the proposed allocation on Jowett Walk states that the site contains “no identified historic building constraint”; while it does not contain listed buildings, it is adjacent to numerous such designated heritage assets.</p>	<p>where the allocation is carrying forward.</p>	

## Comments on All Site Allocations

This section contains all comments received regarding all site allocations, including public and statutory responses.

Policy	Topic	Summary	Response
General comment on site allocations	Recreation grounds, green spaces	<p>It is wrong in principle/law to build on recreation grounds/playgrounds/pitches without alternative adequate provision being made. 'Alternative provision' will be manifestly inadequate. More houses=more people=more need for civic provision, so there should not be any houses on these needed spaces. Loss of them=degradation of quality of life.</p> <p>Green spaces are particularly important in dense areas and where they act as wildlife corridors.</p> <p>Everyone should have areas of beauty, tranquillity and wildlife within reach.</p> <p>Developing on these spaces will harm fragile local infrastructure, particularly water supply, drainage and sewage disposal.</p> <p>Many brownfield sites and underused properties should be used first and the local plan should bear down on these, not green spaces.</p> <p>Shouldn't be developing new sites for future needs- should only worry about present local residents' needs.</p>	<p>The Local Plan protects and network of green spaces, including a core network which it is important to retain in situ, and a supporting network. Within the supporting network, there may be potential for re-provision of the green space functions of the site, so development may be possible if that can be achieved. It is not assumed from the outset that alternative provision that is adequate cannot be made. The majority of the supporting network is not allocated, and even on the supporting network it may be difficult to find solutions for re-providing the green infrastructure functions.</p> <p>However, where there is interest in developing the site and potential means of re-provision of its functions seem to be attainable, then an allocation can be made.</p>

Policy	Topic	Summary	Response
General comment on site allocation policies	Accessibility to Oxford rail station	I notice that a lot of the Interim Regulation 18 stage site assessment forms note that a high number of proposed developments are a significant distance away from Oxford railway station. It is therefore very clear that the Cowley Branch line needs to happen ASAP, not least to fulfil the government's Oxford-Cambridge Arc – the high-tech developments are in southeast Oxford, and it's just so difficult to get there from the railway station. This is a fault of geography, but needs to be factored in.	Comment noted.
General comment on site allocations	Transport connections	Proper north-south, east-west links are needed to support developments- cycle highways or even trams.	As Highways Authorities, Oxfordshire County Council has worked with us on the Infrastructure Development Plan, and needs in each quadrant of the city are listed within Chapter 8.
General comment on site allocations	Wrong to have these policies	The City Council should not be making such decisions about property. Just let them build.	Positively managing development is the purpose of the planning system.
General comment on site allocations	Too few	There are too few site allocations.	Oxford does have a shortage of available and suitable sites, due to the tightly drawn boundaries. To be allocated, there has to be some certainty a site will come

<b>Policy</b>	<b>Topic</b>	<b>Summary</b>	<b>Response</b>
			forward. However, other sites may well come forward as windfall.
General comment on site allocations	Community uses are also important	Some sites should be for community use, not just housing and there must be access to facilities and services such as community centres, entertainment, medical services.	Chapter 7 of the draft plan includes a suite of policies to ensure good access to a range of facilities important to local communities.
General comment on site allocations	BBOWT	<p>We have also looked at the individual PDFs for the site allocations we have commented on. These however provide little detail making it difficult to assess the potential impact of development on the surrounding natural environment. For example, no information regarding the proposed development quantum is given in the site policies despite this information being essential for assessing potential impacts – e.g. it makes a big difference whether a site is proposed to deliver 10 units or 50 units.</p> <p>Whilst it might be beneficial for policies not to be too descriptive (e.g. if insufficient masterplanning and capacity work has been done to determine a feasible quantum) we believe that at this stage in the LP process policies should provide at least an approximate or ‘up to’ estimate together with a clear set of criteria against</p>	<p>Capacity assessment forms have been produced to inform the site allocation policies. These will be published as part of the evidence base at the next consultation stage (Reg. 19). Whereas the site assessment forms published to support the Reg. 18 consultation were produced as part of the Sustainability Appraisal.</p> <p>The interactive map published at Reg. 18 included a layer which showed the locations of the proposed sites in the city as well as various other layers such as green infrastructure, ecological designations,</p>

Policy	Topic	Summary	Response
		<p>which the development will be considered. An indication of housing numbers for residential allocations should be included at the next stage of consultation.</p> <p>We have not been able to find any detailed maps showing which parts of the allocated sites are considered appropriate for development, which areas are for wildlife-rich green space etc. Such maps should be provided at the next stage of consultation.</p> <p>to accompany the individual site allocation policies although this information is essential to help locate the site on the policies map and to provide clarity on the boundaries. We ask the Council to address this shortcoming and to provide more information and a map with its policies.</p>	<p>heritage considerations and flood mapping for the city.</p> <p>We will publish maps showing the locations of each site in the chapter and the policies map will also show their location, alongside a variety of other policy considerations that have a spatial dimension.</p>

## Natural England

Topic	Summary	Response	Outcome
Site allocations	<p>The plan should allocate land with the least environmental or amenity value (NPPF para 171). Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected. Land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. <i>General advice is provided as part of the annex to submitted comments.</i></p>	<p>The process for determining site allocations will be discussed across the Sustainability Appraisal and a separate background paper on site selection. We are also regularly discussing the preparation of our HRA with you and will continue to do so.</p>	<p>Sustainability Appraisal and site selection background paper to be published at Reg 19 along with HRA. Discussions to continue with Natural England as and when needed.</p>
Site allocations	<p>Natural England note that a number of site allocations are within close proximity to designated sites. Where this is the case, it will be necessary to ensure a robust assessment of impacts is undertaken and appropriate mitigation can be provided and secured. It is Natural England's advice that sites which would result in unavoidable impacts</p>	<p>As noted earlier, we are undertaking a Source Pathway Receptor Analysis for the SSSIs as well as Habitats Regulations Assessment for the SAC and this will help identify all the relevant sites that might impact on</p>	<p>Source Pathway Receptor Analysis and HRA work to be published alongside Reg 19 consultation. Key findings will be reflected in relevant allocations including site-specific mitigation</p>

Topic	Summary	Response	Outcome
	and/or where mitigation cannot be secured, should not be pursued.	these designations, in line with your comment. We will ensure any recommendations from that work, including site-specific mitigation requirements, are reflected in the relevant allocation policies.	requirements where necessary.

## National Highways

Topic	Summary	Response	Outcome
Chapter 8 – site allocations	<p>Three residential sites border the SRN. These are sites 113, 1e and 463. No employment sites border the SRN. These sites will need to pay close attention to the impact on the SRN during planning application stage and National Highways would expect to be consulted further on these sites when proposals come forward.</p> <p>Whilst a traffic impact assessment has yet to be performed there is an expectation for a potential</p>	<p>Traffic Modelling has been undertaken that looks at the impact of all development sites proposed to support the city's growth over the plan period as part of HRA work. This work shows that the impact of Oxford city's growth on the SRN (i.e., the A34), is less than 1,000AADT.</p>	<p>At the meeting, the City Council and National Highways agreed that the issues raised within National Highways response to the Reg. 18 Plan consultation had been satisfactorily resolved.</p>

Topic	Summary	Response	Outcome
	impact on the strategic road network due to the number and proximity of sites to our network.		

## Oxfordshire County Council

Topic	Summary	Response	Outcome
Proposed New Site Allocations	<p><b>Strategic Planning</b></p> <p>The County Council has an interest in how the City proposes to address housing need as any new allocations are likely to have implications in respect of the County's statutory functions. The Local Plan will need to address the identification, provision, funding and overall deliverability of the infrastructure and County Council services needed to support sustainable development. As such, we will continue to encourage regular communication between relevant parties. For sites to be allocated outside of the City for Oxford's unmet need, the County Council's main concern is that they are well connected to Oxford and provide the best opportunities for making use of existing and proposed transport infrastructure, including enhancing and</p>	Noted. We will continue our dialogue with the County as the site allocation process move forward.	<p>Oxford City Action:</p> <p>Continue working with the County Council to draft site allocation policies</p>

Topic	Summary	Response	Outcome
	making better use of sustainable public transport and active travel links into Oxford. At this stage, the proposed additional sites do not provide details regarding capacity therefore the County Council cannot comment on potential infrastructure requirements.		

### Thames Water

Topic	Summary	Response	Outcome
Site allocations	The information contained within the new Local Plan will be of significant value to Thames Water in future infrastructure planning, but the draft allocations do not have housing numbers at this stage. Would welcome more details on the proposed developments when they become available and also an early contact from the developers.	See earlier response re: recommending developers undertake early engagement with Thames Water. Full site allocations with minimum housing numbers will be published as part of the Reg 19 consultation and we would welcome additional engagement with yourselves on them through that process or separately.	No further action – additional engagement to be undertaken in due course.

## Site Allocations from LP2036 or LP2040

This section contains queries regarding the site allocations from the previous local plan LP2036 or LP2040 which was withdrawn (see the Introduction and Local Plan Timeline sections of this report for more context).

Local Plan	Topic or location	Summary	Response
LP2040	Development sites	The OLP2040 had complete site allocation policies, now these seem to have simply disappeared without updates as already allocated, but whether already allocated or not, there are always policy updates required as circumstances change.	The Regulation 19 draft LP2045 will include detailed site allocation policies.
LP2040	Policy SPS10: Knights Road	Headington Heritage: This policy is longer included within the Reg. 18 Plan. Site should be not allocated as site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford). Cumulative impact of other developments on green space.  Surface flooding will lead to sewage discharge at Oxford Sewage Treatment Works.	LP2045 does not propose a site allocation for this policy.
LP2040	Policy SPS17: Edge of Playing Fields, Oxford Academy	Headington Heritage: This policy is longer included within the Reg. 18 Plan. Site should be not allocated as site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford).	LP2045 does not propose a site allocation for this policy.
LP2040	SPE3 – Headington Hill	Headington Heritage: Policy now removed – previously in LP2040.	LP2045 does not propose a site allocation for this policy.

Local Plan	Topic or location	Summary	Response
	Hall and Clive Booth	<p>Very substantial damage has been done to Headington Hill Conservation Area by thoughtless insensitive development by OBU. Cuckoo Lane, in particular has been damaged by a “welcome glade” and expansive views of ugly buildings.</p> <p>Much of this site boundary is in the most sensitive part of Cuckoo Lane yet this is not even mentioned.</p> <p>Modification Requested:</p> <p>Deep foundations or hard surfaces can affect ground and surface water flows. Greenfield run off be required.</p> <p>“...supporting the setting of the conservation areas” should be changed to “not harming” this, is IN the Conservation Area.</p> <p>Headington Hill has calcareous springs or surface water as map per below, showing TUFA, Fen and probable peat reserves in and around Headington Hill Park.</p>	

Local Plan	Topic or location	Summary	Response
		<p>Modification requested:</p> <p>Site allocation policies should include a requirement to undertake hydrological and fen survey, and recovery where possible.</p>	
LP2040	SPE4 – OBU Marston Campus (LP2040)	<p>Headington Heritage: Policy now removed – previously in LP2040.</p> <p>No indication as to why SUDS are required here and not elsewhere, the Marston SSSI impact zone is a very wide area.</p> <p>Headington Hill has calcareous springs or surface water as map per below, showing TUFA, Fen and probable peat reserves in and around Headington Hill Park.</p> <p>Modification requested:</p> <p>Site allocation policies should include a requirement to undertake hydrological and fen survey, and recovery where possible.</p>	<p>Site is included as an allocation in the 2045 plan. The allocation policy will include requirements to mitigate the potential impacts on the New Marston SSSI.</p>
LP2036	329 - Valentia Road	OLP2036 included a policy that allocated this site for housing (10 dwellings). The site does not feature on the list of potential policies in the new local plan. Concerned that	LP2045 does not propose a site allocation for this policy.

Local Plan	Topic or location	Summary	Response
		<p>policy will not be carried forward as capacity is potentially less than 10 dwellings.</p> <p>Modification requested.</p> <p>Include a policy for this site backed with evidence and clear policies re groundwater catchment.</p>	
LP2036	622 - Coolridge Close	<p>OLP2036 included a policy that allocated this site for housing (10 dwellings). The site does not feature on the list of potential policies in the new local plan. Concerned that policy will not be carried forward as capacity is potentially less than 10 dwellings.</p> <p>NO further development should be permitted in the Lye Valley this is in the groundwater catchment of the Lye.</p> <p>Modification requested.</p> <p>Include a policy for this site backed with evidence and clear policies re groundwater catchment.</p>	LP2045 does not propose a site allocation for this policy.
LP2036	629 - Wood Farm Health Centre	OLP2036 included a policy that allocated this site for housing (10 dwellings). The site does not feature on the list of potential policies in the new local plan. Concerned that	LP2045 does not propose a site allocation for this policy.

Local Plan	Topic or location	Summary	Response
		<p>policy will not be carried forward as capacity is potentially less than 10 dwellings.</p> <p>NO further development should be permitted in the Lye Valley this is in the groundwater catchment of the Lye.</p> <p>Modification requested.</p> <p>Include a policy for this site backed with evidence and clear policies re groundwater catchment.</p>	
LP2036	SPE10 - Hill View Farm	<p>(LP2040 Policy Reference)</p> <p>Do not include policy as a site allocation as planning application has been approved</p>	LP2045 does not propose a site allocation for this policy.
LP2036	SPE11 - Land West of Mill Lane	<p>(LP2040 Policy Reference)</p> <p>Do not include policy as a site allocation as planning application has been approved</p>	LP2045 does not propose a site allocation for this policy.
LP2036	SPE12 - Marston Paddock	<p>(LP2040 Policy Reference)</p> <p>Do not include policy as a site allocation as planning application has been approved</p>	LP2045 does not propose a site allocation for this policy.

## Additional Site Suggestions

This section contains public queries or suggestions for site allocations.

Location	Summary	Response
Telephone exchanges across Oxford	There are at least four telephone exchanges in Oxford: Speedwell Street, Oakthorpe Road in Summertown, Headington and Cowley. Conventional landlines are being phased out. As a result, some or all of these may be decommissioned during the lifetime of the plan and may become available for development	At the current time these sites are not available, and there has been no indication from the landowners or leaseholder that they will be available in the plan period.
Butts Lane, Marston	Previously submitted in Call for Sites and previously assessed as part of wider Green Belt parcel 114a in 2023 GB assessment. Request a thorough Grey Belt and Green Belt assessment of the land in isolation from the rest of 114a. The site is Grey Belt and offers a sustainable, previously-developed site for up to 20 homes.	The majority of this site (114e) has been put forward as a site allocation policy in the draft plan and included in the SHLAA.
Pullens Lane, Headington	Carter Jonas is instructed by the Morrell Family Trust (“the Trust”). The Trust owns the Pullens Lane Allotments (“the Allotments”), which are located adjacent to Oxford Brookes University’s Clive Booth Student Village in Headington. The allotments are in fact surrounded on all four sides by existing development, as shown on the plan appended	The Strategic Housing Land Availability Assessment (SHLAA) will be published as part of the Regulation 19 consultation. There is not a surplus of allotments in the city and allotments are part of the Core Green Infrastructure Network because they are important to protect in situ.

Location	Summary	Response
	<p>to this letter. The Trust (via Carter Jonas) has submitted the Allotments for the Council's consideration during "Call for Sites" exercises in 2021 and 2024. We look forward to understanding the Council's assessment of the site in the next update of the HELAA when it is published.</p> <p>It is disappointing that there is not an up-to-date HELAA to support the current consultation. The Trust's land interests at Pullens Lane have strong potential for future development in Oxford City Council's new Local Plan 2042. The Trust considers that the Allotments would be suitable for new residential (use class C3) or student accommodation.</p> <p>The Pullens Lane Allotments are far from well utilised and have only been partially used for some years. The Allotments could be made available for development within the next 5 years. The site is well located within Oxford City and benefits from being within walking and cycling distance of a range of services and facilities. Furthermore, it is within a reasonable walking distance to several bus routes, including key bus routes serving Oxford City Centre, and beyond.</p>	

Location	Summary	Response
	<p>The Trust has access rights to the site via John Garne Way to the west, and while it is accepted that Pullens Lane might be an alternative access route and is a single lane carriageway, it is maintained to a high standard. Moreover, there is the potential in this location to consider a reduced vehicle type development like those which the Council is promoting elsewhere in the city. Therefore, in short, there is ample access to the site.</p> <p>Development in this location would constitute sustainable development in accordance with the presumption in favour of sustainable development, as set out in national policy.</p> <p>The Trust is very concerned that the Council has taken a very broad approach to managing allotments in the draft Local Plan. It states in the Local Plan, in the preamble to draft Policy G1 – Protection of Green Infrastructure that the disposal of allotments requires application to the Secretary of State and is only consented in exceptional circumstances. This is not</p>	

Location	Summary	Response
	<p>the case in every circumstance: The Allotment Act 1925 generally does not apply to private allotments. The Act primarily focuses on allotments provided by local authorities and those created under specific statutory provisions, not privately owned or managed plots.</p> <p>The Trust strongly objects to the proposed 'protection' of its land for allotments through policy G1 - as shown on the consultation policies map. There is no clear justification for this approach, and as a private allotment site it is not subject to the same controls as other allotments which are owned by the Council. The Trust would urgently like to discuss the Council's proposed and currently unjustified approach to its land in the emerging Local Plan.</p>	
Oxford Golf Club, Hill Top Road	This should be allocated- it is private lan not accessible to the public. The site is huge and sustainable. The parts of it of less landscape value should be developed.	Currently, the site is on a long lease to the golf club, with no current interest from the landowners in developing the site.
Blanchfords, Headington	Surprised that the former Blanchfords building supplies depot in Headington is not listed as it seems a prime site for development.	Every effort has been made to elicit a response from the landowner, but without any apparent interest from the landowner in bringing forward the site for development, for now we have to assume it will remain as a timber yard.

Location	Summary	Response
		The general policy approach of the plan would allow development of the site for housing, should it come forward, without an allocation being needed.
South Parade, Summertown	This could be added to the list as it is an area in need of rejuvenation, with the opportunity for land assembly and development, including improvements to the public realm.	There is no clear opportunity here at the current time, with a wide range of landowners and mix of well occupied buildings.
Ultimate Picture Palace, Cowley	Would like there to be protection for this.	General policies protect cultural uses, with some flexibility to respond to changing needs. Protecting each facility individually is not needed or appropriate.
Ellison Institute, Littlemore	Something should be said about this, restricting too much building on the site.	It is not considered appropriate to have a policy restricting development of this site.
Oxford North	Oxford plays an important role in national economy. There is significant potential for employment and housing to meet local and Oxford's needs at Science North, the area between Oxford Parkway, Oxford North and London Oxford Airport.	The Local Plan can only cover the City Council's administrative boundaries. There is a dedicated site allocation policy for Oxford North which indicates that planning permission will be granted for mixed-use development including residential and knowledge-economy employment.

## All Public Responses to the Whole of Chapter 8

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
Chapter 8	Infrastructure with new development	In the site allocations there are many mentions of new housing, but no specific mentions of schools or GP surgeries. Are current facilities expected to absorb the increase in the residential population?	Policy S3 and the accompanying evidence (the Infrastructure Deliver Plan (IDP)), set out the infrastructure needed to support development in the plan. The IDP sets out a list of specific projects identified to mitigate the impacts of planned development. As part of the plan-making process, we work with infrastructure delivery partners to identify and deliver the necessary infrastructure to support growth proposed in the Local Plan.
Chapter 8	Culture	The section on "city of culture" contained no questions on culture. What community facilities do you think contribute to Oxford's	These facilities fall under use class F2 which are considered community facilities.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		mission? What is the position on concert halls, galleries, museums?	
Chapter 8	Food growing spaces	More edible plants in community areas	We agree food growing spaces can also contribute to biodiversity (and vice versa) where they are designed appropriately. Criterion i of policy G2 already sets this out as one of the benefits that should be explored.
Chapter 8	Support for golf course	Keep the golf course if you are serious about local recreational amenities, green spaces, flood control and biodiversity. Golf keeps people fit and healthy!	The policy approach is to require re-provision of the community facilities.
Chapter 8	Sports facilities	Infrastructure for open space, sport and recreation must be informed by evidence (see paragraph 103). The Council needs to complete the review of its Playing Pitch Strategy and undertake to update its built sports facilities strategy. The new infrastructure needs identified should then be added to the Council's infrastructure development plan.	Policy S3 and the accompanying evidence (the Infrastructure Deliver Plan (IDP)), set out the infrastructure needed to support development in the plan. The IDP sets out a list of specific projects identified to mitigate the impacts of planned development. As part of the plan-making process, we work with

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
			infrastructure delivery partners to identify and deliver the necessary infrastructure to support growth proposed in the Local Plan.
Chapter 8	NHS dental practices	More NHS dental practices.	Policy S3 and the accompanying evidence (the Infrastructure Deliver Plan (IDP)), set out the infrastructure needed to support development in the plan. The IDP sets out a list of specific projects identified to mitigate the impacts of planned development. As part of the plan-making process, we work with infrastructure delivery partners to identify and deliver the necessary infrastructure to support growth proposed in the Local Plan.
Chapter 8	Canal improvements	The remaining sections of canal towpath beyond the existing improved area should be considered for improvement to provide a	Areas within Cherwell District boundary are outside of OCCs control.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		suitable standard throughout and to join to other improvements within Cherwell district which may be forthcoming as a result of housing allocations.	
Chapter 8	Proposal for an Air Cable Transport system	<p>An Air Cable Transport system running from Redbridge Park and Ride to Westgate shopping centre. Run by bus companies, this would provide a quicker, more reliable route for tourists and commuters into the city.</p> <p>By providing parking for tourist coaches at Redbridge and an attractive alternative, that is a tourist attraction in its own right, we could greatly reduce the number of tourist coaches entering the city.</p>	Noted.
Chapter 8	Park & Ride for Cowley	<p>One thing that would really help is a Park &amp; Ride for Cowley. It could be on the Unipart site or the Oxford Stadium site; this would provide excellent transport links to both Cowley Road (whose businesses are dying, coincidental to not being on a Park &amp; Ride bus route) and the surrounding business/innovation areas. It's also needed for those people who have essential but low-paid jobs and who can't</p>	Reasons for permitted uses in Unipart policy are set out in site allocation form.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		afford to live closer and have to get to work at non-peak hours (for example, a nurse who lives in Brize Norton, for example, has to drive to the JR rather than get the bus).	
Chapter 8	Transport	Transport. We desperately need the park and rides to be further enlarged and ideally for the service to be free. In addition, smaller buses on new routes between different parts of the city, rather than as currently having to go into the centre and then out. The LTNs need to be revised - e.g. the barrier in Crowell Road should go! And proposals for bus gates or congestion charges should be scrapped.	Noted. The County Council as Highways Authority does take a lead in overall transport strategy.
Chapter 8	Safeguarding of land	EWR Co considers that the local plan could also better inform stakeholders and users of the document by providing information about the EWR route safeguarding in the local plan and on the local plan policies map. EWR Co has issued guidance for local authorities and developers on the implications of the safeguarding directions for both the determination of planning applications and the preparation of local plans. Paragraphs 24 to 29	A new Policy on safeguarding is now included in Chapter 8 of the Plan- Policy I2, which includes reference to EWR.

Draft policy	Topic	Summary of comments	Response
		<p>of the guidance deal with the implications for local plans and advise that:</p> <ul style="list-style-type: none"> <li>• The area safeguarded should be represented on the policies map (in accordance with regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)</li> <li>• Local Planning Authorities (LPAs) should not include proposals in the local plan that conflict with the safeguarding directions</li> <li>• Local Plans should state that the safeguarding directions have been made by the Secretary of State for Transport, they are not proposals of the LPA and the route of EWR will not be determined through the local plan process; it will instead be subject to an application for development consent under the Planning Act 2008.</li> </ul> <p>As it stands EWR Co considers that the plan is deficient in that it makes no reference to the safeguarding of the EWR route, either within the local plan itself, or on the interactive policies map. This should be rectified in the submission</p>	

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<p>version of the local plan so that all who may have an interest in the future development of sites in the city can take the potential impact of EWR into account in designing their development proposals and can take appropriate steps to avoid and/or mitigate any potential impacts which might otherwise prejudice the delivery of parts of the EWR route.</p>	
8	Chapter 8 Consult with NESO (electricity)	<p>National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET.</p> <p>Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes.</p> <p>As the nation moves towards net zero, the fossil fuels that once powered the economy will</p>	Comment noted and database updated.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<p>be replaced with sources of low-carbon electricity, such as offshore wind farms.</p> <p>NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South.</p>	

## General Comments Collected During Consultation

Topic	Summary	Response
15-minute cities	Support for the 15-minute cities concept – it was not publicised well, but it has worked in other cities.	Noted.
Recreation grounds	These sites are used by residents, football teams and clubs from all ages and all walks of life. To lose these would be at the detriment of the area and locals, especially young people.	The detailed site allocation policies seek re-provision of sports facilities.
Clarity over how housing figures have been reached	<p>There should be greater clarity regarding:</p> <ul style="list-style-type: none"> <li>• the capacity for housing within the city's administrative boundaries;</li> <li>• why the plan period start date of 2022 has been chosen;</li> <li>• how the housing figures from the existing OLP and the extant Local Plans for neighbouring local authorities relate to the housing requirement over the new plan period; and</li> <li>• the approach to be taken to meeting residual unmet need.</li> </ul>	Since the Reg 18 consultation the plan period has been adjusted to 2025 – 2045. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.
More deference to national policy	Re-stating the NPPF's contaminated-land rules, the Environment Act's 10 % biodiversity-net-gain requirement or the Future Homes Standard's net-zero-ready fabric provisions does not enhance protection; it merely piles extra reports onto applicants.	The city has a local net zero target of 2040 and the national requirement is 2050. Many policies are bespoke to ensure we meet this target.
Council tax is too high	The excessive regulation enforced by the Council means Council Tax is too high. People can't afford to buy houses because they are having to subsidise social housing.	This is beyond the remit of Planning.
Transport issues	<ul style="list-style-type: none"> <li>• Please could you find ways to stop cars and traffic dominating our city?</li> <li>• Please could you make park and ride work?</li> </ul>	The City Council will continue to work with the County Council to identify potential solutions to these issues, with the aim of enhancing

<b>Topic</b>	<b>Summary</b>	<b>Response</b>
	<ul style="list-style-type: none"> <li>• Please could you stop stationary traffic where queues of drivers try to get into the Westgate Centre? If that continues to be the reality once the Botley Road is open again, it will be very bad.</li> <li>• Please could you find ways for cyclists to be able to use the roads without confronting potholes and drain covers with large gaps around them?</li> <li>• Please could you find a way for cyclists to go east west without having to dismount from their bikes?</li> <li>• Please could you stop buses driving up Queen Street?</li> <li>• Traffic congestion is significantly caused by private school drop-offs.</li> <li>• Proper cycle highways and trams needed to connect the city.</li> <li>• Move the coach station to the Becker street carpark next to the main station to save public transport network and pedestrian accessibility.</li> </ul>	<p>public realm. 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.</p>

