Background paper 011

Title: Urban Design, Placemaking, Heritage and Archaeology

This paper addresses: Principles of high-quality design, the historic environment of Oxford including designated heritage assets.
Relevant Local Plan Objectives: • Permit well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. • Protect and enhance our valued and important heritage.
SA Objective(s): 11. To promote good urban design through the protection and enhancement of the historic environment and heritage assets while respecting local character and context and promoting innovation.
SEA theme(s): Cultural heritage, landscape.

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1. Introduction

1.1 The importance of high quality design in creating places where people feel safe and rooted and want to be is well recognised. Good design can create or enhance unique character, but is also about functionality, helping to make a place that is attractive for walking and cycling, that feels safer from crime and vehicle traffic and can help stimulate social interaction. Good design means resources are used more efficiently and maintenance costs are reduced. Good design is also linked to health and wellbeing, making space for nature, as well as building resilience to climate change.

1.2 Understanding of existing character, whether that is from natural or built features, is the starting point of creating good design. Strongly linked to that is identifying and understanding heritage assets. Heritage assets are strongly protected in national policy. In recent years there has been a subtle change in national policies that require the significance of heritage assets to be weighed up against the potential benefits of new development. There is also an increased understanding of the wide range of things that contribute to the importance of heritage assets, which includes the significance placed on them by local people.

1.3 The Council has a duty to protect and enhance historic environment through the Local Plan, this is important for delivering sustainable future for city. The historic environment is important for supporting wellbeing and economic growth too, particularly in Oxford, where it acts as a significant draw for tourists globally every year and helps to contribute to the special character of the city. Protections for the historic environment are not about ensuring no development happens to them full stop, instead the focus is on managing change so it happens in right way so we preserve historic environment for benefit of future generations.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

The National Planning Policy Framework (NPPF) 2024 and Planning Practice Guidance (PPG)

2.1 The NPPF (2024) places significant weight on good design as a means of bring about sustainable development, creating “better places”, and bringing about development that is suitable and appropriate for the communities where it takes place. Paragraph 135 sets out how planning policy and decisions should ensure that development:

a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
b) *are visually attractive as a result of good architecture, layout and appropriate and*

effective landscaping;

c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

2.2 There is the expectation that design policies are developed alongside local communities in order to reflect the aspirations and defining characteristics of the local area (paragraph 132). The NPPF further requires that the greatest possible amount of clarity on what is expected with respect to design outcomes and requirements is facilitated as early as possible in the development process (para 126). It promotes the use of tools such as design guides and codes within instruments like local plans and supplementary planning documents to create a framework setting design standards and requirements, with the level of detail or prescription tailored to the specific setting.

2.3 Continued engagement during the development of emerging individual schemes is also encouraged, with the onus placed on local authorities and to some extent applicants/developers to ensure early local involvement in the evolution of schemes (paragraph 132). Local authorities are expected to be proactive in using methods such as design reviews, workshops and assessment frameworks such as Building for a Healthy Life to ensure design quality (paragraph 138).

2.4 Paragraphs 202 to 221 of the NPPF contain policies specific to the historic built environment and heritage assets. The objective of the policies is to maintain and manage change to heritage assets in a way that sustains and, where appropriate, enhances its significance.

2.5 Heritage significance is the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. This significance may derive not only from its physical presence, but also from its setting.

2.6 'Great weight' is to be given to conservation and clear and convincing justification is required for all grades of harm, including through change to the setting, Justification must be on the grounds of public benefits that outweigh that harm (paragraphs 208 and

209). Public benefits will most likely be the fulfilment of one or more of the objectives of sustainable development as set out in the NPPF, provided the benefits will endure for the wider community and not just for private individuals or corporations. In order to make a sound decision, a planning authority needs to understand from the applicant the significance of any heritage asset affected (paragraph 211). This may require some investigative work, but the information to be supplied with the application should be proportionate to the asset's importance and the potential impact.

National Design Guide

2.7 The National Design Guide (updated January 2021) is a material consideration and forms part of national planning guidance setting out the characteristics of well-designed places and demonstrating what the government considers good design to mean in practice. The guide outlines and illustrates ten characteristics of good design falling under the topics of Climate, Character and Community. The characteristics range from context, identity and built form, through to nature, public space, movement, and the uses on the site including homes and buildings, the resources used to construct them and their life span. Each is discussed in detail in the guide but are illustrated in the circular diagram in Figure 2.1.

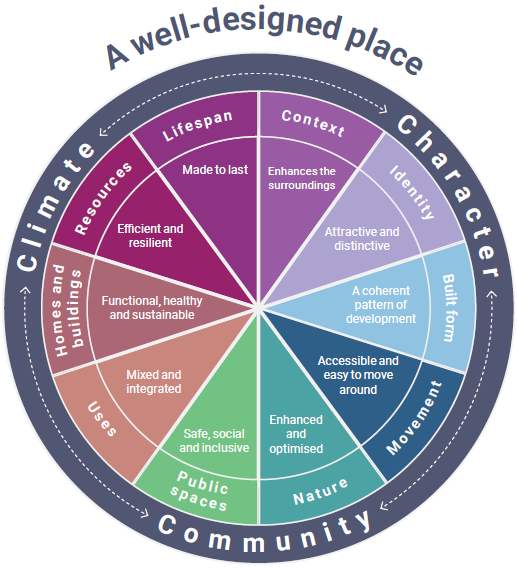


Figure 2.1 - Ten characteristics of good design (DCLG National Design Guide 2021

Listed Building Act

2.8 The Planning (Listed Buildings and Conservation Areas) Act 1990 provided listed buildings and conservation areas with additional protections relating to the granting of planning permission. It created special controls for the demolition, alteration or extension of buildings, objects or structures of potential architectural or historic interest.

Oxford Local Plan 2036

2.9 Existing policies from the Oxford Local Plan 2036 are working to protect the historic environment in Oxford. The design and conservation policies can be found in Chapter 6 'Enhancing Oxford's heritage and creating high quality new development'. The plan promotes high quality design and placemaking through Policy DH1:

Policy DH1: High quality design and placemaking
Planning permission will only be granted for development of high quality design that creates or enhances local distinctiveness.
All developments other than changes of use without external alterations and householder applications will be expected to be supported by a constraints and opportunities plan and supporting text and/or visuals to explain their design rationale in a design statement proportionate to the proposal (which could be part of a Design and Access Statement or a Planning Statement), which should cover the relevant checklist points set out in Appendix 6.1.
Planning permission will only be granted where proposals are designed to meet the key design objectives and principles for delivering high quality development as set out in Appendix 6.1.

2.10 In order to protect Oxford's unique historic environment described above, further policies in Chapter 6 include:

- Policy DH2: Views and building heights
- Policy DH3: Designated heritage assets
- Policy DH4: Archaeological remains
- Policy DH5: Local Heritage Assets
- Policy DH6: Shopfronts and signage
- Policy DH7: External servicing features and stores

Other relevant plans/programmes/strategies

Conservation Area Appraisals

2.11 Appraisals have been written for a number of our conservation areas, some of which are currently being updated. These documents detail the locations and characteristics which contribute to each area's architectural or historic importance, as well as opportunities for enhancement. They are available to view on the conservation webpages under conservation areas.

Assessment of the Oxford View Cones (Oxford City Council)

2.12 View cones are drawn as triangles from important viewing points to encompass the width of the area containing buildings that constitute Oxford's historic skyline. A View Cones Assessment has been prepared to examine the significance of views, identifying their special qualities. The View Cones Assessment sets out a methodology for heritage

assessment of the Oxford views and applies this to each of the view cones. It describes and analyses the important features of the view cones. The study enables a greater understanding of the significance of all parts of the view cones, i.e. not just the skyline. It is designed to aid understanding of the impact of proposals on views.

2.13 The 10 identified view cones do not represent an exhaustive list of viewing points that provide an important view of Oxford's skyline. There may be glimpses of the famous skyline in other locations, and tall buildings in particular that are proposed outside of the view cones might still have an impact on the historic skyline.

High Buildings Study (LDA, 2018)

2.14 The High Buildings Study is in two parts-the Evidence Base Report and the Technical Advice Note. The Evidence Base Report (EBR) summarises the current 'baseline' of Oxford and has utilised mapping and 3D city wide modelling. The 'baseline' analysis looks at townscape character areas, how the city is structured such as through identifying the location of the city centre, district centres, and the main transport routes, as well as the current nature of building heights across the city. The EBR looks at the geographical distribution of heritage assets within the city and the ways in which setting contributes to the heritage significance of these assets and their potential to be affected by high buildings. The EBR also considered where future growth in the city is planned or may be anticipated. The EBR concludes by identifying 'Areas of Greater Potential' for high buildings. These are areas that are relatively unconstrained by heritage considerations and also represent opportunities for high buildings such as at district centres and transport nodes. The Technical Advice Note (TAN) is a guidance document that supports policy within the Local Plan 2036 and aims to shape the growth of Oxford positively.

Cowley Branchline Densification Study (LDA, 2025)

2.15 The intention of this study is to give guidance to guide the opportunities for growth and regeneration within this Area of Focus. This includes opportunities that may arise from the planned investment in the Cowley Branch Line and associated walking, cycling and public transport connection to the stations from existing and future residential and commercial neighbourhoods. The study aims to guide development so that it extends the compact and mixed-use development of Oxford's core and district hubs to within the area of change, limiting sprawl and inefficient use of land, and maximising connectivity and availability of facilities and services.

A Character Assessment of Oxford in its Landscape Setting (LUC, 2002) and update Addendum Report (LUC, 2022)

2.16 The report was commissioned in recognition of the importance of the city's landscape and townscape and the changes it faces. The assessment looks at the component parts of the city, including its villages and neighbourhoods, and their individual characteristics

which make up the city as a whole. It considers the historic, cultural and architectural associations, open places, wildlife and natural habitats and perceptual characteristics that combine to create Oxford's sense of place. The study helps in understanding which open spaces in the city are important in landscape terms, which areas of the city are sensitive to change and merit protection and opportunities for enhancement.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Context of the city

3.1 Key to Oxford's character is the fact that it is located in a floodplain overlooked by surrounding ridges, which create a backdrop to the 'dreaming spires'. These ridges provide an important backdrop to Oxford's cityscape. Oxford's setting is defined by agricultural vales to the north and south, wooded hills to the east and the west and river valleys extending through the urban core of the city. The river corridors running either side of Oxford's historic core are also an essential part of its special character and landscape setting.

3.2 Oxford's character is also defined by its unique built environment. The iconic skyline and architecture produced by the limestone colleges and towering spires create a world famous urban environment. As set out in the Oxford Local Plan 2036: *"It is important that design choices about building heights are informed by an understanding of the site context and the impacts on the significance of the setting of Oxford's historic skyline, including views in to it, and views within it and out of it. Taller buildings will be possible in many locations, but they must be designed to ensure they contribute to the existing character, and do not detract from the amenity of their surroundings."*

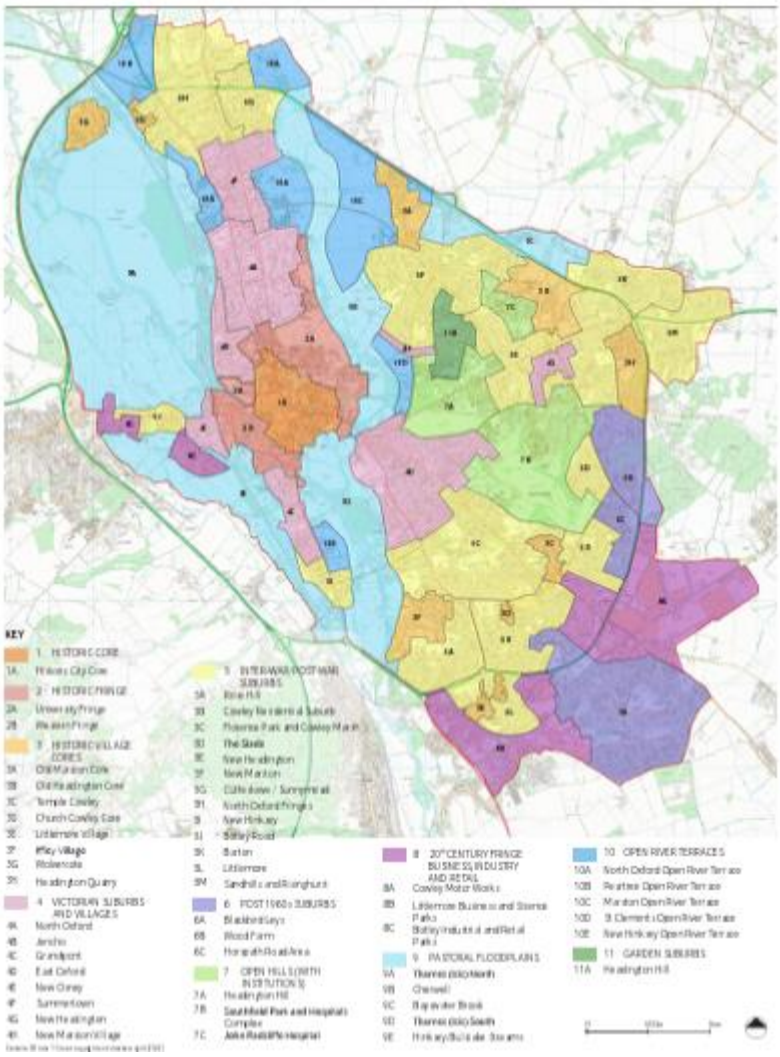


Figure 3.1 - Landscape character areas of Oxford as identified in the Character Assessment of Oxford in its landscape setting and updated using research for the Heritage Assets Register Project

Historical context and heritage assets in the city

3.3 Oxford contains buildings spanning every major period of British architectural history from the 11th century onwards Oxford's extensive history of settlement and cultural significance has contributed to a wide array of statutory designations across the city which are of national importance for ongoing protection for the benefit of future generations. The city hosts around 1,500 listed buildings, with the proportion of grade I and II* as a total of all listed buildings being more than twice the national average. Statutory listing protects both the inside and outside of a building, as well as fixtures and fittings (like windows, doors or staircases) and subsidiary buildings that form the 'curtilage' of the building. Alterations can only be made to a listed building if the Local Planning Authority (LPA) grants Listed Building Consent for any changes that might affect the special architectural or historic interest of the building.

3.4 There are 18 Conservation Areas designated across the city at present3. Conservation area designation is afforded to areas to identify that they have special architectural or historic interest that makes them worth protecting and improving. They include a diverse range of qualities from the compact college environment found in the city centre, the open green space found in the Headington Hill Conservation Area, to the vast meadows in Wolvercote and Godstow. Architectural styles and landscape qualities are diverse, but they all have the common element of containing features that contribute to our historic past. Oxford's Conservation Areas are as follows:

- Bartlemas
- Beauchamp Lane
- Binsey
- Central (University and City)
- Headington Hill
- Headington Quarry
- Iffley
- Jericho
- Littlemore
- North Oxford Victorian Suburb
- Old Headington
- Old Marston
- Osney Town
- Oxford Stadium, Sandy Lane
- St Clement's and Iffley Road
- Temple Cowley
- Walton Manor
- Wolvercote with Godstow

3.5 In addition to Listed Buildings and Conservation Areas, there are other important national heritage designations in the city including 10 scheduled monuments and 15 Historic Parks and Gardens which form an important component of the wider green infrastructure network.

3.6 Aside from national designations summarised above, there are a number of locally designated assets which have been identified on the Oxford Heritage Asset Register. This is a register of buildings, structures, features or places that make a special contribution to the character of Oxford and its neighbourhoods through their locally significant historic, architectural, archaeological or artistic interest. Locally listing does not establish the same level of protection as national listing in of itself.

3.7 Beyond these formally registered local assets, the city then also hosts a large number of traditional buildings (e.g. those built prior to modern methods of construction that arose in the 20th century) which also contribute to the wider character of Oxford. These other

buildings may still benefit from special qualities or features that are characteristic of older construction/architectural styles which warrant protection where possible, and may also require more careful approaches to redevelopment that reflect the unique ways these buildings function (e.g. passive ventilation) compared with modern buildings built today.

3.8 Three of Oxford's heritage assets are currently on Historic England's Heritage at Risk Register, which identifies sites most at risk as a result of neglect, decay or inappropriate development. These are the Church of St Thomas the Martyr, St Thomas Street (condition poor, priority category D - slow decay; no solution agreed), Minchery Farmhouse (condition poor from slow decay, no solution, priority C), and Church of The Holy Family, Blackbird Leys (condition very bad, priority A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed).

3.9 The features below ground also make an important contribution to Oxford's rich heritage and the city has a rich archaeological abundance comprised of features that were deposited at various points in the past from prehistoric times to the modern day. The unique archaeological heritage of the city encompasses a wide variety of asset types. Notable assets include prehistoric domestic, ritual and funerary sites located across north Oxford and the remains of an important Roman pottery manufacturing industry to the south and east of city. The town is also distinctive for its middle-late Saxon urban remains, its emergence as a major cloth trading town in the Norman period and for the numerous assets associated with Oxford's development as an international centre for academic study including the remains of multiple religious institutions, academic halls and endowed colleges. Other assets of particular note include the town defences, the distinctive remains associated with the medieval Jewish Community and the Royalist Civil War defences.

Encouraging high-quality urban design

3.10 Oxford continues to develop exciting new buildings at the forefront of modern architectural design. 4 of the 13 2021 RIBA south award winners were new buildings in Oxford, 6 of 13 in 2022, 3 of 11 in 2023, 2 of 6 in 2024 and 2 of 6 in 2025. Many of these award winners are within the historic core of Oxford and respond sensitively to that context, whilst successfully achieving modern and functional design that meets its brief.

3.11 Oxford City Council have been running the Oxford Design Review Panel (ODRP) for over 10 years. It is run in house by the Urban Design team with a highly experienced panel of 40 members. Design Review is an independent and impartial evaluation process conducted by a panel of built environment experts and was set up to ensure that there is a consistently high standard of design for significant built environment projects. It aims to embed best practice in urban design into the planning process. The panel promotes high quality design to help create better buildings, streets and public spaces in the city and all major development proposals are encouraged to engage with ODRP before a planning application is submitted.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 There is an on-going development pressure on historic assets and this is likely to remain the same over the coming years. However, a strong suite of historic environment policies remains in place within the Oxford Local Plan 2016-2036. There are areas where fairly significant amounts of development area expected, and these have 'Area of Change' policies within the Oxford Local Plan 2036, intended to help manage change within these areas.

4.2 The factors that enable the development of successful new buildings that are modern yet integrated are varied, and many will remain. The existing Local Plan policies such as DH1 ensure the design of proposals responds to its context from the start of the process and that sufficient information is submitted to allow a thorough understanding of the design implications. After 2036, Policy DH1 will no longer be a current policy and the NPPF will be the framework under which planning applications are determined. Although the proposed changes to the NPPF appear to reflect a move towards greater emphasis on 'beautiful' design, this would still lack the detail and specificity which is reflected in local level policies, particularly in a city like Oxford.

4.3 In addition to well-designed buildings, it is attention to walkability, landscaping, layout and availability of services that are vital to a positive experience of a place, wellbeing and health. The Oxford Local Plan 2036 identified areas of change. Without a new plan these areas of change may not provide guidance for the right areas.

4.4 Local level policies are able to focus on a level of detail which applies to the specific setting of the local area, for example Policy DH2 of the Oxford Local Plan 2036: Views and building heights, relates specifically to Oxford's view cones and it iconic skyline. In the absence of this local specificity in planning policies, there would be greater risk that the level of detail which the city needs in order to protect Oxford's uniqueness would be lost.

4.5 One of the legacies of the COVID-19 pandemic and the response to it has been a change in the way that people use the public realm, arguably engendering a greater appreciation of what is, and is not, on one's doorstep. There are clear links between urban design and health and wellbeing, and it is more important than ever that places are designed with an awareness of the impacts on these. In times of social distancing, design can also help reduce perceptions of risk. Designs that allow for safe social interactions and that help to instill a sense of community are very important. This means places designed to give space for people to interact safely and to feel comfortable in, with access to nature and opportunities for outdoor recreation and with an emphasis on designing spaces for people, not cars.

4.6 The risks from climate change, such as milder, wetter winters and hotter, drier summers, will impact everyone in Oxford. Design should respond to the challenges of climate change. Buildings will need to help adaptation to climate change, for example by being well insulated and naturally ventilated to deal with potentially hot summers, reducing the risks and damages of flooding events, ensuring biodiversity is maintained, ensuring there are green spaces to absorb rainwater and reduce flood risk, and to provide natural shade in the summer.

4.7 In terms of our contribution to climate change, the running of buildings is responsible for 81% of carbon emissions of Oxford, 29% of the total being from the running of residential dwellings[2]. In Oxford there is a careful balance that needs to be struck between preserving heritage value and retro-fitting buildings to reduce their carbon contributions. However, we take as a starting point that historic buildings are inherently sustainable. The inherent embodied energy (i.e. the energy expended and encapsulated within the fabric of a building in its construction) of historic buildings means that their retention and care is consistent with modern concepts of sustainability and with the ambitions of reducing carbon emissions. The 'whole building approach' seeks to save energy, sustain heritage significance, and maintain a healthy indoor environment through understanding the building in its context.

5. Key Issues addressed through the Local Plan 2045

Introduction

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to green infrastructure. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan. In some cases the review of the options has resulted in changes to the names or references of the policy taken forward to the 2045 plan. The running order of the policies in the plan may also have been amended from the Regulation 18 stage.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Overall approach to different types of historic assets

5.3 At Regulation 18 stage, the preferred option was for the plan to include a suite of policies separately addressing each type of designated heritage asset were proposed in order that the nuances of the local context relevant to each can be more clearly conveyed.

Following the consultation, it was noted that while the historic environment of Oxford is of particular national significance and uniqueness, the proposed policies directly reflect national policy approaches with no deviation of note. Although not having policy could not be justified because of the unique environment, it was considered that that the best approach for the Plan would be to have a consolidated policy that addresses all relevant types of heritage asset within the city – to avoid unnecessary repetition and facilitate conciseness. Nuances and specifics on the local context can be captured in the policy supporting text or within site allocation policies as required.

5.4 There are a number of locally significant heritage assets which the Local Plan also sets out protections for through policy HD4. These non-designated heritage assets may or may not be identified in the Oxford Heritage Asset Register but still have a local relevance that, whilst not being of merit for national-level designation, is still important for supporting the wider character of the city. The policy protection afforded to these assets is not as strong as national designated assets but sets out requirements for mitigating impacts and avoiding their loss in line with the level of significance that they are deemed to warrant.

5.5 There is a significant archaeological presence across the city as was flagged earlier in the paper, and where possible it is important that this is preserved from loss through inappropriate development. At times, information is limited to there being knowledge of potential for archaeology only, thus the policy seeks to ensure that where necessary applicants undertake the appropriate investigation to identify any potentially valuable finds and undertake suitable mitigation to prevent their loss. In particular, the policy flags the City Centre Archaeological area as an area with known high concentrations of archaeology.

Promoting the principles of good design

5.6 National guidance on good design is clear that heritage considerations are an important contextual factor which should inform good design, and as such the Council is keen to ensure that these are factored into the design process for development in Oxford. The Local Plan includes an overarching design policy (policy HD1) which sets out principles of good design for Oxford including requiring applicants to utilise the design guidance held within the appendix to ensure a comprehensive approach to design of new development. This design guidance includes a checklist to prompt applicants to take appropriately address the relevant design considerations within the design rationales for their schemes.

5.7 The emphasis of the assessment will be on a design process that is clearly explained and justified, and a demonstration that the proposed development is one that works well for its intended uses and is responsive to the immediate and wider context.

Appendix A – Regulation 18 Policy options sets

- A number of potential topics for policies derive from the analysis set out in the previous sections. These will be important for delivering upon the various Local Plan 2045 objectives that seek to ensure that development at all scales in the city is of the highest design quality, and that Oxford's visual character and street scene, and its unique skyline and views in and out of the city are preserved and enhanced.

- The Local Plan 2045 therefore includes proposed policies to address aspects both protection and enhancement of different elements of the historic environment as well as a number of policy areas seeking to guide applicants towards high-quality design.

- For each potential policy, options for the specific approach that could be taken for the Local Plan 2045 have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

- Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). A summary of this screening process is included at the end of each options set table.

Policy options set 011a (draft policies HD1, HD2, HD3, HD4): Designated Heritage Assets

- A cornerstone of good design is about ensuring proposals are informed by an understanding of existing context and designed to respond to this positively. In Oxford, a key part of this context is defined by the presence of heritage assets, and many of these have been designated for their national and local importance. There are a variety of designated assets in the city, from conservation areas and historic parks/gardens, to listed buildings and scheduled monuments, and their protection is not only about the features of the assets themselves, but often also about their wider setting.

Table A.1 - Policy options set 011a: Designated Heritage Assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a set of policies relating to designated assets that reflects the NPPF (including Conservation Areas, Listed Buildings, Registered Parks and Gardens, and Scheduled Monuments), that set out how impacts on designated heritage assets will be assessed, when mitigation is required, and how harm should be balanced against benefits, including Oxford-specific detail in relation to what harm and benefits may be for different types of assets in Oxford/in different parts of Oxford.	This could set out Oxford-specific considerations, giving local detail to the direction of the NPPF and helping to ensure local context is considered in proposals and decision making. It gives more clarity for applicants.	A list of potential harms and benefits in Oxford could never be definitive and will not precisely fit all situations. It is important it does not take over from case-by-case consideration based on specifics of the case.
Option b Include a policy or set of policies for designated heritage assets (e.g. listed buildings, conservation areas) that reflects the NPPF but does not include	Ensures that new development schemes are built to the highest standard of design to maintain and enhance Oxford's reputation as a world class city. Specific aspects of design addressed using checklist.	Policy wording covers a lot so is long and can be unwieldy to read through and understand. This approach relies on overarching principles that may not address specific design issues. The policy would not have to include all

Oxford-specific detail in relation to harm and benefits.		designated assets, for example there is not scope for a policy that does much more than repeat national guidance in relation to scheduled monuments and important parks and gardens. Generally, this approach of largely repeating national guidance is unnecessary.
Option c No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF has specific direction on delivering well-designed places, which it is not necessary to repeat.	It might be difficult to ensure proposals reflect Oxford context,risk of non – compliance with NPPF by not having more specific policies.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? A or b or c **High-level screening conclusion?** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about protecting designated heritage assets, to ensure that the significance of valued and important heritage is conserved and that understanding of the value and importance is enhanced. Options a and b prioritise the protection of Oxford's designated heritage assets, ensuring the assessment, prevention or where necessary mitigation of harm. Option c would provide no local steer on the protection of designated heritage assets, but rely on national policy and guidance. The options would all score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the options would also require new design to mitigate against any potential harm, and respond to local context. Option c would have a more neutral impact as it would rely on national policy. There is no direct national policy,

but it does promote good design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Designated Heritage Assets – draft policy HD1, HD2, HD3, HD4

- The preferred approach for the Local Plan 2045 policy is to have a local policy that elaborates on the NPPF, following the same approach, but applying that to specific heritage types, and also adding additional guidance in the policy where relevant and Oxford specific information in the supporting text. Given the significance of heritage in Oxford, it is important that the local plan contains a suite of heritage policies to enable application of the NPPF approach in Oxford, with a detailed expectation of requirements.

- As such the preferred option is option A. A suite of draft policies in proposed, that explain how the NPPF approach should be applied to different types of designated heritage asset, and which includes more detail than the NPPF and will enable the supporting text to include Oxford-specific information. This will help ensure Oxford's designated heritage assets are understood and responded to appropriately in the planning process.

Policy options set 011b (draft policy HD5): Non-Designated Heritage Assets

- There are several historic buildings and other assets which do not meet the requirements for protection of a national designation, but which are of importance to the city for their locally significant heritage values. Oxford City Council maintains a list of local heritage assets known as the Oxford Heritage Asset register (OHAr). The OHAr provides the opportunity to identify those elements of Oxford's historic environment particularly valued by local communities. Locally important heritage assets can be added to the list when they are identified, if they meet the criteria. The current policy ensures that heritage assets of local importance will be a material consideration when determining planning applications. Buildings and structures on OHAr are not given any statutory protection from demolition.

Table A.2 - Policy options set 011b: Non-Designated Heritage Assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach

Option a Include a policy that requires development to consider heritage assets of local importance. The policy would also set out criteria for assessing whether an asset has locally important heritage interest, and how to identify non-designated heritage assets.	This is very helpful in adding clarity and highlighting the importance of local assets and ensuring something of their significance is reflected in new proposals.	There is a risk the list could be seen as definitive, and it is then considered that anything not on the list has no heritage value.
Option b No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF has specific direction on local heritage assets, so it is not necessary to repeat it and that would aid conciseness of the Plan.	It might be difficult to ensure proposals reflect Oxford context, or to argue that something is a heritage asset if it is not clear that they are considered important in Oxford and what the criteria for defining them is.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? A or B **High-level screening conclusion?** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about how to protect local heritage assets in a manner appropriate to their significance. Option a would add clarity and highlight the importance and significance of such assets within a local context, whereas option b would rely solely on national policy and guidance. Option a would score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the option would also require new design to mitigate against any potential harm, and respond to local context. Option b would have a more neutral impact as it would rely on national policy. There is no direct national policy, but it does promote good

design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Non-designated Heritage Assets – draft policy HD5

- The preferred approach for the Local Plan 2045 policy is to have a local policy that elaborates on the NPPF approach to non-designated heritage assets. The policy approach needs to align with the NPPF, but by including a policy there is the opportunity to reference the Oxford Heritage Asset Register and also to reiterate how non-designated heritage assets may be identified.

- As such the preferred option is option A. A draft policy is proposed that sets out how non-designated heritage assets will be considered, which is accordance with the NPPF. In addition it sets out routes by which a non-designated heritage asset may be identified.

Policy options set 011c (draft policy HD6): Archaeology

- Just as with its built environment, Oxford has a rich archaeological heritage that has been progressively built up from prehistoric times to the modern day. This archaeology has the potential to aid understanding of our heritage. New development presents opportunities to unearth and discover new archaeological remains which need to be fully realised, equally, it has the potential to harm or destroy these assets where their presence is not appropriately investigated, and impacts are not carefully mitigated.

- The policy options are intended to address the presence of archaeology, our preferred approach is to continue to define the City Centre Archaeological Area and require a holistic management plan for the colleges which are areas of known archaeological significance whilst also flagging those important features could be found elsewhere in the city. Where features could be present, we would require appropriate assessments and information gathering that can define character, significance and extent of any deposits so that these are not missed or lost. We would also positively support proposals which are designed to enhance or to better reveal the significance of the asset.

Table A.3 - Policy options set 011c: Archaeology

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Continue to define the City Centre Archaeological Area. For all sites where archaeological deposits or features are suspected, require the incorporation of sufficient information to define the character, significance and extent of such deposits including a heritage assessment and full archaeological desk-based assessment if the initial assessment suggests this is relevant.	There are known to be archaeological deposits of significance across the whole city centre area, so defining this area to flag this up front and ensure assessments are carried out from the start of the process would help to bring certainty. This sets out from the start exactly what is expected which aids certainty for developers.	By defining an area there is a danger that areas outside of this will not be considered from the outset for their potential archaeological importance. To mitigate this a policy would also need to ensure it was made clear that there is potential for archaeological deposits across the city. This adds length and detail to the policy.
Option b Require a holistic management plan for key historic college owned and occupied sites in the City Centre Archaeological Area when development is proposed. These should take a holistic view of the whole college site and should consider features that should guide the location of new development within the site, including best location for basements in terms of impacts on archaeology (and cumulative impacts).	Colleges sites are almost certain to have archaeologic interest, as well as being long-term owners with extended interest in their significant sites, which they are custodians of. Where developing in an area with such significant archaeology it is important that development is considered holistically and located in the best way within a site.	This does require up front work from the colleges.
Option c Where proposed development would impact on archaeological or	This follows the NPPF approach so adds clarity that this would be expected. If the other parts of the	This adds length and detail to the policy which may not be necessary as

paleoenvironmental features and deposits, it will only be supported where the harm to such deposits and features can be eliminated or where, by agreement, mitigated to an appropriate level, conserving the remains and the significance of the archaeological or paleoenvironmental asset better revealed and understanding of that significance enhanced (by agreed measures).	NPPF approach are to be in a policy tailored to Oxford then it would be confusing not to include this also.	it is at least partly covered in the NPPF.
Option d Map more areas as archaeological areas where it is known there are likely to be deposits/not allocate sites where archaeological deposits or features are expected to be present and require heritage assessments with potential desk-based assessments if needed.	There are other known areas of deposits, although none to the extent of the city centre. We could define these on the policies map to help flag the high likelihood of deposits in these areas, which would ensure they weren't overlooked and would add certainty for developers from the start of the process.	This risks suggesting that areas that aren't mapped are unlikely to have deposits. It might be safest to rely on initial investigations for individual sites as they come forward, which can be done in advance for allocated sites.
Option e Do not include a policy about archaeology but rely on national policy instead.	This avoids any repetition with national policy and keeps the plan focused on things that are not already covered in national policy.	Given the importance of the heritage of Oxford and its rich archaeological record it should be highlighted in the local plan. Having no specific policy would miss the opportunity to highlight this importance from the start or to tailor the policy approach to Oxford.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? A, b, c, d, or e, or a combination of a, b, and c **High-level screening conclusion?** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about protecting archaeological and paleoenvironmental assets, to ensure that the significance of valued and important heritage is conserved and that understanding of the value and importance is enhanced. Options a and c would have a positive impact, options b and d do not directly apply restrictions and therefore are more likely to be neutral on their own. Option e does not provide local context, but relies solely on national policy and guidance. The options would all score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the options would also require new design to mitigate against any potential harm, and respond to local context. Option e would have a more neutral impact as it would rely on national policy. There is no direct national policy, but it does promote good design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Archaeology – draft policy HD6

- The preferred approach for the Local Plan 2045is to have a local policy that defines the city centre archaeological area and that also provides guidance for when archaeological deposits are impacted. The city centre area has such a wealth of deposits, that it is almost a certainty that development will impact on them. Therefore, it is worth being upfront and setting out the starting point that deposits are likely to be found. The sets out a clear expectation that there is efficient use of land in all schemes. The policy sets out criteria to be considered in determining a site's capacity, following the same approach, but applying that to specific heritage types, and also adding additional guidance in the policy where relevant and Oxford specific information in the supporting text. Given the significance of heritage in Oxford, it is important that the local plan contains a suite of heritage policies to enable application of the NPPF approach in Oxford, with a detailed expectation of requirements.

- As such the preferred option is option A combined with Option C.

Policy options set 011d (draft policy HD7): Principles of high-quality design of buildings

- High quality design needs to show a good response to its surroundings as well as considering how buildings and spaces interact and function. From the materials selected to build a structure, to the provision of green open space, layout of pedestrian routes and provision of shops/amenities, design of places needs to take account of and balance many considerations in order to be successful.

Table A.4 - Policy options set 011d: Principles of high-quality design of buildings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that requires high quality design and include a checklist to set out key principles of what this means in detail (including principles for materials, layout, potentially secure by design, etc.), requiring that the Design and Access statement or other submission alongside the planning application covers the relevant aspects of good design. Exempt householder applications and changes of use without external alteration from needing to include answers to the relevant checklist questions in their submission.	Would help ensure that new development schemes are built to the highest standard of design to maintain and enhance Oxford's reputation as a world class city. Specific aspects of design addressed using checklist. Sets standards for high quality design for relevant schemes, reflects importance placed on creating distinct places in planning framework.	Types of development that checklist may apply to are limited e.g. householders and change of use not covered. Householder applications should still aspire to high design quality. Checklist can be generic, with overarching principles that may not address design quality issues affecting specific development types e.g. residential dwellings, hotels etc. The alternative is to expand the scope of checklists including becoming more prescriptive. Assessment of schemes may rely on some level of subjective judgement which might be point of contention with applicants and lead to drawn out negotiation and argument. May be onerous to apply and may require extensive officer time.

Option b Include householder applications and/or changes of use applications in the requirement to follow the checklist.	Even if there are no significant external changes of use, they may have an impact on the character of an area. Householder extensions also have an impact. Smaller applications are not necessarily simple and the cumulative impact of poor-quality design and a low expectation for householder applications can have a significant impact on the overall quality, character and particularly appearance of a place.	The impacts on design can be assessed without a checklist for these smaller applications. Many of the urban design principles will not be applicable to these or householder extensions. This approach could be quite onerous without necessarily adding significant value.
Option c include a generic design policy but be less specific e.g. have requirements for good quality design but do not rely on a checklist.	Potentially more flexibility for developers to bring forward compliant schemes and more quickly. Easy to compare requirements to NPPF and other authority baselines.	It might be difficult to ensure proposals reflect Oxford context.
Option d No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF update has more specific direction on delivering high quality design.	It might be difficult to ensure proposals reflect Oxford context, risk of non-compliance with NPPF by not having more specific policies.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a, b, c, or d **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No

Rationale: Options a, b, and c are all alternatives and generally cover how far a policy goes with setting design guidance/requirements (e.g. detailed checklist or more simple). Option C would be considered as an addition to either option a or b and would expand the types of applications it applies to.

In terms of sustainability impacts... Most directly the options would impact **criterion 11. Urban Design**, but depending on the implementation of the options, they are likely to impact other criteria in the SA framework also (e.g. sustainable construction, greening, health and wellbeing etc). Option d and E are likely to have a neutral impact, but options A and B are likely to have a more positive impact because they are more prescriptive and specific about what would be considered good design in the city, potentially, option A might achieve a significant positive for this reason. Overall, the sustainability impacts between the options are similar to each other from a sustainability perspective, it is not considered necessary to scope in for detailed appraisal.

Principles of high-quality design of buildings – draft policy HD7

- The preferred approach for the Local Plan 2045 is to have a local policy that requires high quality design and that links to a checklist that sets out what needs to be considered in order to demonstrate high quality design. This policy approach is not prescriptive, but does ensure a thorough consideration is given to all aspects of high quality design.

- As such the preferred option is Option A. Option B is very similar, but would also require use of the checklist for householder and change of use (with no external alterations). This is not justified, because the approach would not be proportionate to the scale of those developments. Option C or D would not provide sufficient design guidance.

Policy options set 011f (draft policy HD9): Views and Building Heights

- Oxford has an iconic skyline, which includes the 'dreaming spires', as well as several special views into the historic core which are detailed in the Oxford View Cones assessment. These features mean that the city is particularly sensitive to the impacts of taller buildings, and care needs to be taken over the design and placement of such development where it is proposed so that taller buildings do not negatively impact on views of the iconic skyline.

Table A.6 - Policy options set 011f: Views and Building Heights

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Continue to define the area within a 1,200 metre radius of Carfax tower as the Historic Core Area. This area contains all the buildings that comprise the historic skyline, so new developments that exceed 18.2m in height will intrude into the skyline. Require that any buildings above this height are limited and bulk, only thin, delicate and of the highest design quality, demonstrated by stringent appraisals to inform and explain design choices.	This option gives a nuanced approach to assessing heights, which aims to avoid harmful uniform heights but also ensure positive impacts. It does not prevent unwanted intrusion into the skyline because there is a rigorous process to prevent it, but it also still allows fantastic additions to the skyline.	Uniform heights can still occur. An element of judgement is introduced without a set height limit (even though a rigorous policy and process should prevent harm).
Option b Continue to refer to the High Buildings Technical Advice Note (TAN) (or an updated version) as the key evidence base for deciding appropriate heights, designing higher buildings and appraising applications.	The High Buildings TAN contains useful guidance specific to Oxford that helps positively shape design choices in relation to building heights. The guidance is already in place and has been used successfully to inform many applications and decisions.	The guidance can't itself prevent designs that are harmful to character and not justified and this would need to be in conjunction with other policy requirements. It will be necessary to make it clear that local townscape considerations still apply too.
Option c Continue to define view cones, which are the areas within a view from historic viewing places from where the 'dreaming spires' can be most clearly seen. Include a policy that requires	This approach has been successful over a long period of time. Although views of the spires may have altered over time because of growth of vegetation, there are not buildings in the view cones that prevent the viewing, enjoyment and understanding	The approach is limited to views from defined viewing points.

design within the view cones to avoid harming the views of the spires.	of the spires. These are long established as the key viewing points, and the protection, especially in combination with policies relating to the central area, has conserved the important views over time.	
Option d Include an absolute height limit in the city centre that does not interfere with the spires.	This would protect the views of the historic spires as they are.	An absolute height limit can be set lower than it potentially needs to be in order to make sure everywhere is low enough not to interfere with the dreaming spires. Any innovation or change is stifled. This approach can lead to uniform heights, leaving unwanted horizontal line that harms the foreground of views and the setting of historic assets and prevent the spires and towers to be properly discerned, detracting from their significance.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various combinations of options e.g. option a, a+b, a+b+c, b+c+d **High-level screening conclusion?** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** Of the options – option a does potentially allow higher buildings, meanwhile option d is a hard restriction in heights in the city centre. Option B is about making reference to the high buildings TAN to guide design considerations and option C is about incorporating view cones into a policy and including particular considerations in relation to applications within these zones.

In terms of sustainability impacts – key criteria these options are relating to is criterion 11. Urban Design/Historic Environment. All the options would likely have a positive impact for this criterion (at least in terms of supporting the historic environment). The options also potentially have an impact on criterion 12. Economic Growth, because option a is not a hard restriction, it is likely to have a neutral impact on economic growth. Option D is likley to be a negative impact. Option C potentially also has a minor negative impact for criterion 3. Efficient use of land – limiting heights potentially limits development options/density?

Overall, there are unlikely to be significant sustainability impacts from the options that would warrant testing through a detailed Sustainability Appraisal.

View Cones and High Buildings - draft policy HD9

- The preferred approach for the Local Plan 2045 policy is to have a local policy that sets guidance for what a high building is and sets criteria for guiding appropriate height and analysing impacts. The preferred approach is also to define an area within 1,200m radius of Carfax tower as needing very strong justification for any building over a set height. The preferred approach is also to continue to define view context. Taken together, these elements of the draft policy ensure that the important skyline is protected, but do also allow flexibility for well-designed schemes of height, with supporting guidance showing how to determine appropriate heights in different parts of the city.

- As such, the preferred option is a combination of a, b and c. An absolute height limit is not considered appropriate as it does not offer flexibility and could have other significant negative impacts, such as uniform height being introduced.

Policy options set 011g (draft policy HD15): Bin and Bicycle Stores and External Servicing Features

- It is important to ensure that new development is designed with appropriate consideration for bin and bicycle storage and also external servicing features. The Local Plan 2045 seeks to increase the uptake of cycling further to help Oxford achieve its ambitions of improving air quality, reducing congestion and encouraging healthy lifestyles. The Local Plan also seeks to ensure that bins and external servicing features are considered at the initial stages of the design process so they can be designed in

at an early stage rather than being considered as an afterthought which can result in negative impacts on the appearance and amenity of an area. The policies in Chapter 6 of the Local Plan include guidance on bin, bicycle storage and external servicing features whilst the policies in Chapter 7 include bicycle parking design standards.

- The policy options set out below include requirements for the design of these areas. There is also an alternative option of having no locally set policy on bin and bicycle storage and external servicing features.

Table A.7 - Policy options set 011g: Bin and Bicycle Stores and External Servicing Features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Requires that bin and bicycle stores and external servicing features should be considered from the start of the design process and set criteria to ensure they meet practical needs but do not detract from the overall design, that external servicing features are integrated into the design or positioned to minimise their impact and that high quality materials are used. Include compulsory requirements, setting out binding design codes depending on location, building type etc, and requiring fire-safe spaces with adequate electric supply for charging.	Applying a discrete policy ensures considered design of these areas and not just as an afterthought; it helps alignment with other objectives of plan e.g. encouraging active, sustainable travel; effective waste management etc. This can bring in a far greater level of clarity in terms of design requirements, ensuring high design quality, public amenity etc. There is less chance for this area to be overlooked or for poorer quality to be introduced by stealth or negotiation. There are many consistent key principles that can be written into policy, to raise the awareness of the need for good design of these areas from the outset, and to be consistent with increasing e-bike ownership, etc.	Adding further burden to developers in bringing forward schemes; may be too onerous to apply or enforce.
Option b		

No specific policy, rely on NPPF.	NPPF update has specific direction on delivering high quality design.	It may be difficult to ensure proposals reflect Oxford context; difficult to ensure consistent standards and design quality if proposals are always assessed on case-by-case basis; difficult to require a minimum level of servicing without policy.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? - Option a or Option b **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Option a or Option b are alternatives to each other and represent the choice between having a specific local policy or not. In terms of sustainability impacts, the two options relate to **criterion 11. Good urban design, criterion 8. to reduce traffic and associated air pollution and criterion 1. car emissions.** Option a would have a minor positive impact for all criteria above. It would help with urban design, potentially reducing the risk of bin storage being unsightly and could help encourage the use of active travel modes. Option b would have a minor negative impact as whilst there is national policy on delivering high quality design, this is not specific to the Oxford context and could result in poor quality design of either bin storage and/or cycle storage areas. Poorly designed cycle storage could deter the use of bicycle which could exacerbate congestion or air quality issues if people chose to travel by car instead. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

Bin and Bicycle Stores and External Servicing Features – draft policy HD15

- The preferred approach for the Local Plan 2045 policy is to have a local policy that requires bin and bicycle stores and external servicing features to be considered at the outset of the design process. This will help to ensure a higher quality design. It would also help to meet other Local Plan 2045 objectives including encouraging active travel and effective waste management.

- As such the preferred option is option A. The draft policy includes a set of criteria that should be considered. Option B is to not have a bespoke policy but to rely on the NPPF. This may result in inconsistent standards of bin and bicycle storage provision, which may have negative implications including on the urban realm.