

Statement of Common Ground between Oxford City Council and Oxfordshire County Council**Submission Draft (Regulation 19) Oxford Local Plan 2045****July 2026****1.0 Introduction**

1.1 This Statement of Common Ground (SoCG) has been prepared between Oxford City Council and Oxfordshire County Council for the Oxford Local Plan 2045. This SoCG reflects and confirms the current position on matters agreed by both parties with regards to issues of soundness and maintaining effective cooperation.

1.2 Oxford City Council is producing a new Local Plan covering the period 2025-2045. The SoCG reflects the latest position agreed by the parties and is provided without prejudice to other matters that the parties may wish to raise. The area covered by this Statement is Oxford, which is the area covered by the Oxford Local Plan 2045. Where matters arise that are cross-boundary, the Council is also working with its neighbouring local authorities and other SoCGs have been prepared on cross boundary matters.

2.0 Background and Maintaining Effective Cooperation.

2.1 The Local Plan 2045 has been prepared within a changing strategic national context. The legal Duty to Cooperate test was revoked on 25 March 2026 and has been replaced by a policy test whereby plan-making authorities now should demonstrate “effective cooperation”.

2.2 Oxfordshire County Council has a variety of functions, including as the Highways Authority and has produced the statutory Local Transport and Connectivity Plan (LTCP). The County Council is also the Lead Local Flood Authority, the authority responsible for Education, the Minerals & Waste Planning Authority, and has lead roles in other areas such as Public Health and Social Care. Oxfordshire County Council are therefore key stakeholders and a statutory consultee for Oxford City Council to work with, with regards to maintaining effective cooperation on the new Oxford Local Plan 2045.

2.3 Oxford City Council and Oxfordshire County Council have been engaging closely together throughout the formulation of the Local Plan 2045. Oxfordshire County Council provided feedback at each of the key stages of the Local Plan preparation process, including the Issues Stage (2025), Preferred Options consultation (2025), and the Proposed Submission Draft Local Plan Regulation 19 consultation (2026). The relevant consultation summary reports detail summaries of this feedback. Officers have also engaged with each other at key points outside of the formal consultation cycle via virtual meetings to discuss the policy-shaping and supporting evidence (in particular infrastructure which relates to the Oxfordshire County Council’s statutory functions), and to collaborate seeking to resolve areas of disagreement wherever possible.

2.4 The Proposed Submission Draft Local Plan Regulation 19 consultation (hereafter “*the Reg. 19 consultation*”) saw Oxford City Council publish its full Local Plan and supporting evidence base which it proposed to submit for examination to Central Government in June 2026. As per the relevant legislation/regulations, this version of the Oxford Local Plan 2045 was one that the City Council considered to be ‘sound’ for adoption, meeting the specific requirements for soundness as are outlined in the

National Planning Policy Framework. In response to the Reg. 19 consultation, Oxfordshire County Council provided feedback on relevant strategic policies and site allocations, and key evidence base documents (including the Local Plan Viability Study, Sustainability Appraisal and Habitat Regulations Assessment).

2.5 Following the end of the Reg. 19 consultation on 13 March 2026, Oxford City Council met Oxfordshire County Council to discuss their response and to try and find a way forward in relation to the issues identified within the Local Plan and supporting evidence. An initial meeting took place on 27 March 2026, and a follow up meeting took place on 8 May 2026.

2.6 At the initial meeting on 27 March 2026, officers from Oxford City Council and Oxfordshire County Council discussed Oxfordshire County Council's comments on the strategic policies and site allocations, with a view to finding common ground. Both parties agreed that a number of modifications to a selection of policies in the plan would be appropriate. Oxfordshire County Council raised a total of thirty-two objections to the plan or its supporting evidence.

3.0 Strategic matters

3.1 A range of comments and suggestions were put forward by Oxfordshire County Council in relation to the policies of the Oxford Local Plan 2045. Appendix A set out the specific feedback received against each policy and any proposed amendments to address concerns raised.

3.2 The Executive Summary to the County Council's response to the Oxford Local Plan 2045 Reg. 19 consultation highlighted that the 'main objection raised by the County Council refers to Policy S4, since the proposed housing viability cascade is not in line with the County Council's policies on low carbon and the LTCP's objectives'.

3.3 The County Council also requested that housing capacity is carefully reviewed to ensure the maximum levels of housing provision within the city boundary can be achieved, citing specific areas of Oxford including Cowley and Templars Square.

3.4 The County Council also highlighted in the Executive Summary to their response that in relation to Policy S3 (Infrastructure Delivery in New Developments) and Policy CBLAOF (Cowley Branch Line Area of Focus) that the policy wording should be strengthened to ensure that proportionate contributions can be adequately secured for the delivery of the railway line, stations and place-making elements that unlock development.

3.5 The representations from Oxfordshire County Council have been split into two tables. Table A.1 shows the representations made by Oxfordshire County Council, and Table A.2 sets out those representations made by the Oxfordshire County Council Estates and Property Service Team.

4.0 Concluding remarks/areas of agreement

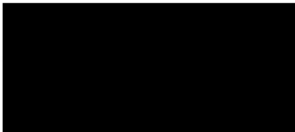
4.1 Oxford City Council and Oxfordshire County Council have worked closely together throughout the preparation of the Oxford Local Plan 2045 preparation process and the subsequent meetings in March and May 2026. The discussions have been productive, and the City Council is appreciative of the comprehensive feedback that officers at Oxfordshire County Council have provided.

4.2 The two parties agree that the changes and responses set out in Tables A.1 and A.2 (Appendix A) address the majority of Oxfordshire County Council's concerns and/or resolve any queries raised in relation to the strategic policies and site allocations of the Local Plan.

4.3 The parties agree to continue to work together to deliver a sound plan within the timescales available.

Signed on behalf of Oxfordshire County Council

Hannah Battye

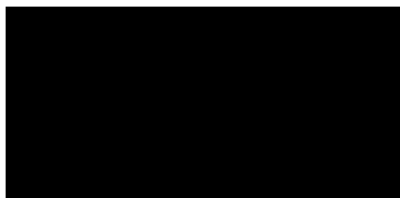


Title – Head of Place shaping

Date: 01/07/2026

Signed on behalf of Oxford City Council

David Butler



Title – Director of Planning and Regulation

Date: 02/07/26

Appendix A – Oxfordshire County Council Reg 19 Feedback and Oxford City Council responses

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Table A.1 Oxfordshire County Council detailed comments and responses

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed	County Council further response
S1	General comment highlighting the County's expectation to agree developer contributions in respect of development proposed in the plan.	Policy S3 sets out more information about developer contributions.	No change proposed	N/A
S3	Policy should be strengthened to ensure proportionate contributions can be adequately secured for the delivery of the line, stations and placemaking elements that unlock new development.	Policy S3 already includes a bespoke reference to the Cowley Branch Line and how contributions are expected to be sought. The County's proposed amendment is in a different part of the policy, which relates to infrastructure contributions more widely. The County Council Representation does not accurately reflect the existing text in policy S3. The correct articulation of the County Council Reg. 19 representation is set out below (the <u>underlined text</u> below shows the full extent of the County's proposed amendment).	Add the following additional text to the second sentence of the second bullet point of the supporting text of Policy S3 under the "Policy context" heading. <i>...Developer contributions and the delivery of infrastructure will be sought through the most appropriate mechanism available, including through the use of pooled contributions and/or forward-funding, where appropriate.</i>	This explanation addresses the concern raised as part of the policy context and clarification in the policy wording.

		<i>Planning permission will be granted subject to the provision of (or appropriate funding towards) the required level of infrastructure to support the development <u>through an appropriate financial contribution prior to, or in conjunction with new development.</u></i> This additional text would appear to seek financial contributions only from new development. It is unnecessary and potentially confusing to include this additional text as the policy is already clear that the granting of planning permission is subject to the provision of the required infrastructure (or an appropriate financial contribution) to support the level of development proposed. However, the City Council acknowledges that S106 contributions can be secured through a variety of mechanisms and as such is proposing an amendment to the supporting text to clarify that position.	Then insert the following text and create a new (3rd) bullet point within the “Policy context” section. <i><u>Developer contributions are currently secured in Oxford using the Community Infrastructure Levy (CIL) and planning obligations (e.g., Section 106 (S106) or S278 agreements).</u></i>	
S4	The County Council does not support this policy as it is not in line with the County Council’s policies on low carbon and the	Policy S4 introduces a cascade for housing sites and for employment generating uses. The County Council response is only concerned with the housing viability cascade.	No change proposed (as agreed at Reg. 18)	The explanation is appreciated. We note the intention that Policy S4 not be used in the manner

	LTCP objectives in relation to reducing car trips. The County Council would like to see developers encouraged to make the best use of land, creating sustainable buildings at good densities and not using land wastefully on car parking. Although discussions with the City Council have taken place, it is the County Council's view that this policy undermines County policies and this matter should be left to specific negotiations between developers and Councils on a case-by-case basis.	Policy S4 is included in the Plan to ensure that (in accordance with the NPPF, paragraph 35), the policies for contributions do not undermine the deliverability of the Plan. The supporting text for Policy S4 sets out that that it provides the basis for negotiations relating to viability, the City Council's priorities for contributions, and the evidential expectations required to demonstrate the viability of an individual scheme. The cascade approaches provide a standardised approach to ensuring development viability. The supporting text of the policy highlights that the viability assessment prepared for the Local Plan 2045 identifies a suite of policies likely to have the greatest potential impacts on site viability. As such, the cascade approaches would seek to reduce a scheme's offsetting payments in the first instance, followed by, in the case of residential schemes, the low car element of the policy (low car development is defined in Appendix 7.6 as follows:		we were concerned about (whereby carbon offsetting and parking restrictions might be given away before any affordable housing). The explanation about the viability assessment is appreciated. We will continue to require contributions under S106 and S278. Any county mitigation/ contributions that are not going to come forward due to viability will need to be assessed on an individual basis to ensure that there is no severe impact and is still policy compliant. We note that the City Council controls the spending of CIL.
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		<i>0.2 car parking spaces per 20 units should be provided on site for working drivers, service and delivery vehicles, pooled cars/car clubs and visitor spaces.</i> As such, where viability issues exist for residential schemes, Policy S4 provides an approach to firstly increase allocated spaces, and then increasing the number of spaces incrementally up to the maximum parking standards (as set out in Appendix 7.6). The Local Plan Viability Assessment Update (BNP Paribas, December 2025) provides evidence to support the viability cascade involving car parking as set out in this Policy.		
H1	<u>General comment</u> The County Council has an interest in understanding how the city is meeting its housing need (and any unmet housing need arising) as any new strategic housing allocations are likely to have transport, education and other implications for the County's statutory functions. <u>General comment: Infrastructure costs</u>	<u>General comment</u> General comment noted. <u>General comment: Infrastructure costs</u> General comment re: infrastructure costs noted.	<u>General comment</u> No action required (as agreed at Reg. 18) <u>General comment: Infrastructure costs</u> No action required	<u>General comment</u> N/A <u>General comment: Infrastructure costs</u> N/A

	The County Council is particularly concerned about growth leading to increased vehicle trips (counter to LTCP targets) and whether the cost of necessary infrastructure to serve housing growth can be met as it may be unaffordable to developers and government and therefore lead to a reduction in quality of life or services. <u>General comment; location of sites for Oxford's unmet housing need</u> The County Council's position is that any site allocations should be well-located in relation to the people they are intended to accommodate. Oxford's unmet housing need should be met on sites close to Oxford, either with good existing walking cycling and public transport links or the ability to provide such links funded from development. <u>Density/ site capacities</u> The County Council is also of the view that the housing capacity of the city needs to be carefully reviewed. This is to ensure the maximum level of housing provision within the city boundary.	<u>General comment; location of sites for Oxford's unmet housing need</u> General comment re: location of sites to meet Oxford's unmet housing need noted. <u>Density/ site capacities</u> The City Council has done extensive work looking to maximise densities of residential developments and the residential component of mixed-use developments within the city. Site allocation policies contain minimum numbers of dwellings, all of which have	(as agreed at Reg. 18) <u>General comment; location of sites for Oxford's unmet housing need</u> No action required (as agreed at Reg. 18) <u>Densities/ site capacities</u> No change proposed	<u>General comment; location of sites for Oxford's unmet housing need</u> N/A <u>Densities/ site capacities</u> It is understood that the proposed policies in the plan are set as a minimum therefore the site could come forward at a higher density subject to
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	In particular, areas such as Cowley Templars Square (Cowley Centre) and Headington where environmental and heritage constraints are less than in other areas. Policies HD1 and HD2 and relevant Areas of Focus must be reviewed to ensure maximum densities can be achieved. <u>Housing at employment sites</u> A number of proposed site allocations (e.g., SPS12 Oxford Science Park) recognise a level of housing could be acceptable however no capacity study or indicative minimum has been undertaken. This comment is repeated later in the representation. <u>Kassam Stadium assumed density</u> Another site allocation, where the minimum density is questioned is the Policy SPS11 Overflow Car Park at Kassam Stadium (allocated for a minimum of 100 homes). The County questions the assumed	been confirmed with landowners that they are deliverable. We are confident that our density assumptions are realistic and deliverable. The Background Papers BGP 015 Developing Site Allocations and BGP 016 Efficient Use of Land set out the approach to identifying sites involving residential development and provide the methodology for identifying appropriate density typologies and for identifying site capacities. <u>Housing on Employment sites</u> See response below for Policy SPS12/E1 <u>Kassam Stadium assumed density</u> Background Paper 016 Efficient Use of Land sets out the methodology for identifying appropriate density typologies and for identifying site capacities. We are confident in our density typologies and the evidence	<u>Housing on employment sites</u> See response below for SPS12/E1 <u>Kassam Stadium assumed density</u> No change proposed	other considerations. As such this matter is considered acceptable. <u>Housing on Employment sites</u> See response below for SPS12/E1 <u>Kassam Stadium assumed density</u> It is understood that the proposed policies in the plan are set as a minimum therefore the site could come forward at a higher
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	density of 80dph and suggests that, given the urban nature of the site's location should be applied, in order to maximise the use of the site under Policy HD2, thereby reducing the amount of housing need in Oxford.	that has underpinned them. It would not be appropriate to simply apply an alternative density assumption to this site.		density subject to other considerations. As such this matter is considered acceptable.
H2	Oxford's need for affordable housing is well-known and it is disappointing that the requirement is proposed to be reduced to 40%. Various sites adjoining the city (in neighbouring district council areas) have a requirement for 50% affordable housing, which aligned with the plan requirement at the time they were allocated (i.e., extant Local Plan 2036). Would the current requirement for 50% affordable housing on sites in neighbouring districts be undermined by having a lower (i.e., 40%) affordable housing requirement in Oxford?	The Local Plan viability study provides evidence for affordable housing and other proposed policy requirements.	No changes proposed (as agreed at Reg. 18)	The explanation is considered acceptable. Matter agreed.
H4	The County Council welcomes the recognition of the need for employer-linked affordable housing for key workers.	General comment noted.	No change proposed	N/A
E1	(Strategic Planning) Policy E1 indicates the circumstances in which new employment uses will be	General comment noted	No change proposed	N/A

	favourably considered. It also includes a part which provides for residential development on employment sites subject to criteria. The criteria include matters of particular interest to the County Council such as being well connected to public transport and active travel opportunities.			
G1	(Landscape and Nature Recovery – Biodiversity / Landscape) <u>G1 layer extends beyond city boundary</u> The G1 layer appears to cover some designated wildlife sites both inside and outside the city boundary but not all, for example Littlemore Brook Oxford City Wildlife Site which connects multiple areas currently designated within the green infrastructure network.	<u>G1 layer extends beyond city boundary</u> The example given is of an “Oxford City Wildlife Site” - Littlemore Brook. This is an Oxford City Council local ecological designation. As such, its extent does not extend beyond the City Council administrative boundary – in fact no G6 Oxford City Wildlife Site extends beyond the city’s administrative boundary. There are two instances where the G1 layer extends beyond the City Council’s administrative boundary. In both instances, part of the site is located within the city council boundary, and part of the site is located within a neighbouring district council’s administrative boundary. This is a mapping error. The Core GI network policies only apply in Oxford city and	<u>G1 layer extends beyond city boundary</u> Amend policies map to accurately reflect the extent of coverage of sites in the city.	<u>G1 layer extends beyond city boundary</u> Agreed and update welcomed.

	<u>Inclusion of all designated wildlife sites in Core GI network</u> The inclusion of all designated wildlife sites in the core area of the green infrastructure network is encouraged to help ensure the aims of this policy are realised. <u>Connecting GI features</u> A focus on connecting green infrastructure features not currently mapped would be welcomed. <u>Mitigation hierarchy</u> Reference to the mitigation hierarchy within this policy regarding G1B and G1C areas would be welcomed where avoidance and mitigation are currently mentioned. <u>Trees and woodland</u> With regards to impacts on trees and woodland, ecological enhancement of existing trees and woodland should also be considered for inclusion. It may	not outside our administrative boundary. <u>Inclusion of all designated wildlife sites in Core GI network</u> The Core GI network includes sites which meet specific GI criteria (as set out in the GI Study). All sites in the city were assessed and included within the Core GI network when sites met specific criteria. Designated sites (i.e., the SAC, SSSIs, LWSs, OCWSs, LNRs) are included within the core GI network. <u>Connecting GI features</u> Supporting text to Policy G2 makes reference to strengthening linkages between areas to enhance network connectivity. <u>Mitigation hierarchy</u> Policy G6 (supporting text) sets out that the mitigation hierarchy needs to be followed when considering Policy G6 ecological designations. <u>Trees and woodland</u> Ecological enhancements are covered in Policy G2.	<u>Inclusion of all designated wildlife sites in Core GI network</u> No change proposed <u>Connecting GI features</u> No change proposed <u>Mitigation hierarchy</u> No change proposed <u>Trees and woodland</u> No change proposed	<u>Inclusion of all designated wildlife sites in Core GI network</u> Comment understood and welcomed. Matter agreed. <u>Connecting GI features</u> Comment understood and welcomed. Matter agreed. <u>Mitigation hierarchy</u> Comment understood and welcomed. Matter agreed. <u>Trees and woodland</u> Comment understood. Matter agreed.
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	also be important to refer to onsite compensation in advance or as soon as possible after the impact being preferable in this section through following the mitigation hierarchy including temporal and spatial considerations. <u>Canopy cover (net gain)</u> Inclusion of the requirement for a net gain in canopy cover, over a no net loss, is encouraged where it can be demonstrated that this is ecologically appropriate. <u>Right tree in the right place</u> Urban settings can present challenges for new planting with the right species and habitat choice and ongoing management are crucial. The principle of the right habitat in the right place should be applied and reflected in this policy.	<u>Canopy cover (net gain)</u> The policy approach broadly aligns with national policy. We have sought a broader green surface cover target through the UGF policy (G3) which could include new trees but also other types of greening depending on what is best for the site. <u>Right tree in the right place</u> The principle of the right tree in the right place is already included with the Council's Urban Forest Strategy. Policy G2 sets out maintenance and management requirements.	<u>Canopy cover (net gain)</u> No change proposed <u>Right tree in the right place</u> No change proposed	<u>Canopy cover (net gain)</u> Explanation understood. Matter agreed. <u>Right tree in the right place</u> Explanation understood. Matter agreed.
G2	<u>LNRS Reference</u> Reference to the use of Oxfordshire's Local Nature Recovery Strategy (LNRS) to inform design and decisions is considered key for this policy.	<u>LNRS Reference</u> Policy G4 Delivering Mandatory Net Gains in Biodiversity and its supporting text refer to the LNRS.	<u>LNRS reference</u> No change proposed	<u>LNRS reference</u> Matter agreed.

	<u>Maintenance and management</u> The maintenance and management arrangements of this policy also link to biodiversity net gain. It may be useful to clarify that the management period of 5 years would be a minimum with longer encouraged and if BNG is being delivered a minimum of 30 years would be required. <u>Right tree in the right place</u> Urban settings can present challenges for new planting with the right species and habitat choice and ongoing management are crucial. The principle of the right habitat / tree in the right place should be applied and reflected in this policy. <u>General comment</u> Larger growing trees that are suitable for the local conditions should be chosen where space permits as these have the potential to offer greater environmental and visual benefits than small trees in the long-term. <u>Additional percentage targets</u>	<u>Maintenance and management</u> BNG is discussed in detail in Policy G4. <u>Right tree in the right place</u> The principle of the right tree in the right place is already included with the Council's Urban Forest Strategy. <u>General comment</u> General comment noted <u>Additional percentage targets</u>	<u>Maintenance and management</u> No change proposed <u>Right tree in right place</u> No change proposed <u>General comment</u> No change proposed <u>Additional percentage targets</u> No change proposed	<u>Maintenance and management</u> Matter agreed. <u>Right tree in right place</u> Matter agreed. <u>General comment</u> N/A <u>Additional percentage targets</u>
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	Targets such as percentage canopy cover and a net increase in green infrastructure should be considered for inclusion and would be welcomed.	Consideration was given to the inclusion of a canopy cover target within the plan. The difficulty for Oxford is that tree canopy cover is not evenly spread across the city, with some areas benefitting from more cover than others. Setting a percentage canopy cover target for a city with such diverse tree canopy cover would mean that some areas exceeded the target and others fell below it. Given the diverse range of existing tree canopy cover it was considered more appropriate to ensure no net loss of trees. A policy target for a net increase in GI (in addition to the mandatory 10% net gain in biodiversity and the 10% public open space requirements for qualifying residential developments), was not considered appropriate for Oxford given its constrained nature and the inherent difficulties		Explanation understood. Matter agreed.
G3	<u>General comment</u> The County Council believes that the Urban Greening Factor (UGF) has potential to deliver benefits in delivering green infrastructure across the city, and we welcome its inclusion in the policy framework. <u>UGF mandatory for all developments</u>	<u>General comment</u> General comment noted <u>UGF mandatory for all developments</u>	<u>General comment</u> No change proposed <u>UGF mandatory for all developments</u>	<u>General comment</u> N/A <u>UGF mandatory for all developments</u>

	We note however that the policy is that the UGF is not mandatory for all developments. However, we wonder whether greatest green infrastructure benefits could be achieved if it was mandatory for all developments, especially if located in areas of existing GI deficiency unless particular circumstances and reasoning are demonstrated. <u>Definition of major development</u> Major development should be defined. <u>UGF for non-major developments</u> The application of UGF for non-major developments should be considered here as a way for smaller developments to demonstrate a measurable net gain in biodiversity to satisfy NPPF and local planning policy when they are exempt from the mandatory BNG requirement.	It is a requirement for larger developments and encouraged on smaller ones. Larger (major) developments can offer the most scope for a wide variety of improvements. <u>Definition of major development</u> Major development is defined in the NPPF (10 or more homes or 1,000 sqm non-residential floorspace). It was also included in the Glossary of the Reg. 19 version of the Oxford Local Plan 2045 following comments from Oxfordshire County Council made at the Reg. 18 consultation stage. <u>UGF for non-major developments</u> Policy G3 already encourages smaller (minors/ householders) to apply the UGF.	No change proposed <u>Definition of major development</u> No change proposed <u>UGF for non-major developments</u> No change proposed	No change proposed <u>Definition of major development</u> Agreed. <u>UGF for non-major developments</u> Noted and agreed.
G4	<u>20% BNG</u>	<u>20% BNG</u>	<u>20% BNG</u> No change proposed	<u>20% BNG</u>

	A minimum BNG requirement of 20% is encouraged in line with other emerging local plans in Oxfordshire. <u>Alternative prioritisation</u> It is recommended that prioritisation should be given to delivering ecological habitat enhancement and creation within the LNRS before delivering habitat enhancement and creation outside of the LNRS within Oxford. Encouragement should also be given to using offsite offset areas outside of the LNRS mapped areas within Oxfordshire as a step before considering sites further afield. It should be clarified that purchase of BNG units from a habitat bank is preferred to the purchase of statutory credits. It is considered that this approach would be more aligned to the LNRS.	Oxford is a small, constrained city with limited opportunities to deliver the mandatory 10% net gains. Increasing the requirement to 20% would not result in more biodiversity net gain in the city but rather an increase in delivery outside of Oxford. District Plans already propose 20% BNG across Oxfordshire. It is important that BNG impacts are received locally. <u>Alternative prioritisation</u> See response above.	<u>Alternative prioritisation</u> No change proposed	Although disappointing, this is understood. Matter agreed. <u>Alternative prioritisation</u> Understood. Matter agreed.
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	The encouragement of delivering more technically offsite difficult habitats that may deliver lower BNG units (due to the application of the difficulty multiplier within the metric) where feasible is welcomed and this approach should also be considered for onsite habitats where feasible.			
G5	<u>Reference to LNRS</u> Reference to the use of Oxfordshire's Local Nature Recovery Strategy (LNRS) to inform appropriate ecological enhancements is considered key for this policy. <u>Encourage native tree planting</u> The requirement to include an element of native planting is encouraged.	<u>Reference to LNRS</u> Reference to the LNRS is made in individual site allocations and within Policy G4 and supporting text. <u>Encourage native tree planting</u> Fourth paragraph of Reg. 19 policy includes a reference to "native planting".	<u>Reference to LNRS</u> No change proposed <u>Encourage native tree planting</u> No change proposed	<u>Reference to LNRS</u> Agreed. <u>Encourage native tree planting</u> Explanation noted and agreed.
G6	<u>Application of LNRS</u> Consideration should be given to how regard will be given to Oxfordshire's LNRS and in particular safeguarding of the priorities of the LNRS within this policy including how the LNRS interacts with the ecological network currently referred to. <u>SSSI buffer zone</u>	<u>Application of LNRS</u> Reference to the LNRS is made in individual site allocations and within Policy G4 and supporting text. The background paper (005b Biodiversity) that was published for Reg 19 includes a full section on how we have had regard for the LNRS. <u>SSSI buffer zone</u>	<u>Application of LNRS</u> No change proposed <u>SSSI buffer zone</u> No change proposed	<u>Application of LNRS</u> Understood and agreed. <u>SSSI buffer zone</u>

	'Development proposed on land immediately adjacent to any SSSI designated wildlife site or priority habitat must be designed with a buffer to that site <u>or habitat</u>' <u>Local sites</u> Similarly, the text 'Where proposals result in habitat loss within a LNR or LWS, they must retain and enhance the interest features for which the site was selected' could be expanded to ensure other types of designated site are included. <u>Road Verge Nature Reserves</u> Reference to Road Verge Nature Reserves (RVNRs) as a type of designated wildlife site would be welcomed within this policy, particularly as RVNRs are present within Oxford. Further information regarding RVNRs and RVNRs within Oxford city can be found at https://www.oxfordshire.gov.uk/sites/default/files/file/countryside/RVNRSurveyReport.pdf.	The SSSI buffer zone was developed and evidenced through the Source Pathway Receptor Analysis (SPRA). The City Council does not consider that it is appropriate to arbitrarily widen its application to all designated sites/ priority habitats. The considerations for mitigating impacts from development will vary with every site (based on species and habitats present). <u>Local sites</u> No alternative text provided for consideration. City Council considers that the policy is sound as drafted. <u>Road Verge Nature Reserves</u> Supporting text already includes a link to Oxfordshire County Council biodiversity guidance.	<u>Local sites</u> No change proposed <u>Road Verge Nature Reserves</u> No change proposed	Matter understood and agreed. <u>Local sites</u> Understood and agreed. <u>Road Verge Nature Reserves</u> Noted and agreed.
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G8	Urban design <u>Design guide</u> The policy refers to the City's Design guide and other standards, it is not clear if these are already in place or are part of this Local plan and will subsequently be adopted. Landscape and Nature Recovery – Biodiversity It should be clearly stated that SUDS design should aim to maximise biodiversity value as far as feasible.	<u>Design guide</u> The policy wording simply relates to the most recently published standards (and future proofs them for when new standards are published). <u>Biodiversity and SuDS</u> Policy already references green infrastructure and the supporting text highlights additional benefits including... “providing habitats to support wildlife”.	<u>Design guide</u> No change proposed. <u>Biodiversity and SuDS</u> No change proposed	<u>Design guide</u> Explanation understood. Matter agreed. <u>Biodiversity and SuDS</u> Agreed.
R6	<u>Highest quality soils</u> It would be useful to define what is considered 'highest quality soils' in the context of this policy. For example, nutrient poor soils would have a high value for biodiversity and creating species rich grassland habitats but a lower value for activities such as agriculture that would value a high nutrient soil content.	<u>Highest quality soils</u> This policy seeks to protect soils. The highest quality soils are often considered to be those in the higher categories of the Agricultural Land Classification system (i.e., grades 1-3a) - but it could vary depending on the specific context of the site (e.g. the profile of soils will look quite different in more rural parts of the city compared to more urban areas). Consideration was given to including a definition however it was considered that using a narrow definition (such as the above), may not provide contextually specific support for a range of soil types.	<u>Highest quality soils</u> No change proposed.	<u>Highest quality soils</u> Explanation welcomed and understood. Matter agreed.
HD7	<u>Definition of major development should be included in policy</u>	<u>Definition of major development should be included in policy</u>	<u>Definition of major development should be included in policy</u> No change proposed	<u>Definition of major development should be included in policy</u>

	It is supported that Policy HD7: Health Impact Assessment contains the wording that HIA is 'required' for major planning applications, although it would be strengthened by making it clear in the policy wording exactly how Oxford City Council defines 'major'. Other local authorities are increasingly using quantifiable thresholds in their HIA policies. Appendix 6.2 contains further information on how to complete an HIA, directing the user to OCC's HIA Toolkit as well as specifying the thresholds for an HIA to be undertaken (10 or more dwellings or 1000m2 or more of non-residential development. This is strongly supported in principle, but would be more enforceable if this advice were included within the wording of Policy HD7 in the main body of the Local Plan. The County Council requests that the term 'major development' is defined within Policy HD7 itself (rather than just in Appendix 6.2)	Major development is defined in the Glossary of the Reg. 19 version of the Oxford Local Plan 2045 and in National Policy (NPPF, December 2024). There is no need to re-define the term major development in this policy.		Noted and agreed.
C1	<u>Mobility hubs</u>	<u>Mobility hubs</u>	<u>Mobility hubs</u>	<u>Mobility hubs</u>

	The first bullet point under the 'Policy context' section states: "The city and district centres are highly accessible mobility hubs that include a broad range of facilities including shops, hospitality, community and leisure facilities." The opening sentence is not clear on the definition of mobility hub. It reads that the city and district centres as a whole are mobility hubs. This sentence should be reworded and provide clearer language. One example could be: The city and district centres include a range of mobility hubs (refer to Mobility Hub Strategy) helping to create places which are highly accessible. <u>Modification:</u> clarify definition of mobility hub. For example: "The city and district centres include a range of mobility hubs (refer to Mobility Hub Strategy) helping to create places which are highly accessible."	The intention is to set the context that district centres and the city centre are all highly accessible locations. Without adding a long (and potentially convoluted) explanation in the plan setting out the different types of hubs (major interchange hubs, linking hubs, suburban hubs), we consider that it might actually be more confusing to amend the supporting text in the manner that has been suggested. This is because it would not necessarily be obvious that there are different types of hubs, and it is not necessary for understanding that the city and district centres are highly accessible locations. However, a modification is proposed to add additional explanation to the Glossary.	Amend the definition of Mobility hub in the glossary as follows: <i>Mobility Hub: An area in which a variety of transport modes and community assets are co-located for seamless interchange. <u>In Oxford these vary from major interchange hubs, to linking hubs to suburban hubs. These facilities provide added benefit to communities and combined they make up an easy-to-use transport network</u></i>	Noted and agreed.
C2	The County Council requests the following modifications to Policy C2: Modifications:			

<u>OCC's Street Design Code</u> - At the end of the first paragraph of Policy C2, after the phrase "[...]" and this should be low car" please add "<u>and have incorporated OCC's Street Design Code.</u>" <u>Delete "well-located from bullet point e)</u> - In sub-paragraph 'e)', please remove the word "well-located". It could be interpreted in a variety of ways. <u>Include references to cycle parking in bullet point f)</u> - In sub-paragraph 'f)' please add the following after "Public realm improvements for cyclists: "-by providing cycle parking in convenient locations which benefit the public realm using thoughtful inclusive design and materials, catering for standard and non-standard bikes, including children's bikes." <u>Public space</u> - While the text mentions tree planting, including incorporation of small greenspaces, it is important to still ensure there is some big	<u>OCC's Street Design Code</u> As the County's most recent Street Design standards is not yet published, we have not referenced it in the plan. However, Policy C6 includes a reference to the published Street Design standards. <u>Delete "well-located from bullet point e)</u> This change weakens the policy as it does not support "well-located" public car parking. <u>Include references to cycle parking in bullet point f)</u> The amendments proposed seem to prioritise public realm improvements for cycling only focusing solely on cycle parking and neglecting other users, i.e., pedestrians and public transport users. Policy C7 already covers cycle parking requirements. <u>Public space</u> Bullet point h) states: <i>h) Enhancement and new opportunities for public realm and landscaping such</i>	<u>OCC's Street Design Code</u> No change proposed (as agreed at Reg. 18) <u>Delete "well-located" from bullet point e)</u> No change proposed (as agreed at Reg. 18) <u>Include references to cycle parking in bullet point f)</u> No change proposed (as agreed at Reg. 18) <u>Public space</u> No change proposed	<u>OCC's Street Design Code</u> Noted and agreed. <u>Delete "well-located" from bullet point e)</u> Noted and agreed. <u>Include references to cycle parking in bullet point f)</u> Explanation understood and matter agreed. <u>Public space</u> Noted and agreed.
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	open/public space for people to dwell, rather than expect everyone to pass through.	<i>as tree planting, including incorporation of small green spaces where people can stop, dwell, socialise and play;</i> Bullet point h) already provides advice about the enhancement of existing and the creation of new public realm and landscaping in the city and district centres.		
C4	<u>Local Education Authority reference</u> In the first bullet point under 'Policy context' in Policy C4, the text makes reference to the 'Local Education Authority' which is no longer in use. Please update the term to 'Local Authority with responsibility for Education'.	<u>Local Education Authority reference</u> We have proposed the following changes to the supporting text of Policy C4 and the Glossary to accommodate this terminological clarification.	<u>Local Education Authority reference</u> Amend second sentence of first bullet point as follows: <i>The City Council has worked closely with partners including the County Council as the <u>Local Authority with responsibility for Education</u> Local Education Authority to plan the educational needs of the city...</i> The phrase "Local Education Authority" also appears in the Glossary within the definition of "Key worker". Bullet point ii) of the Key worker definition to be amended as follows: <i>ii) Schools: qualified teachers in any <u>Local Authority with responsibility for Education</u> Local Education Authority school....</i>	<u>Local Education Authority reference</u> Update is welcomed and agreed.

	<u>General comment re: joint user agreements</u> Policy C4 states that planning permission will be granted for new / redeveloped learning institutions if (inter alia) where possible, joint user and shared use agreements are made. This is an appropriate phrasing: as set out previously, in the case of new schools it will not be possible at the point of granting planning permission to make joint use agreements, as there is not at that time a responsible body in place. Redevelopment projects at existing schools vary greatly, and will not necessarily result in any change in facilities which could be made available to the community. <u>Accessibility requirements for new learning and non-residential institutions</u> The requirement that school developments will be accessible to those who will use it by walking, cycling and public transport should allow for some flexibility as a matter of equality of access, as, for example, if the project is an expansion of a special school, depending on the needs of the pupils it may not be possible for	<u>General comment re: joint user agreements</u> General comment re: joint user agreements noted. <u>Accessibility requirements for new learning and non-residential institutions</u> The policy itself applies to all schools and not just SEND schools. Both new SEND schools, and the expansion of existing SEND schools should be accessible by a range of different modes of transport including public transport (which includes taxis). Given the accessible nature of Oxford, most schools in the city are accessible by a range of different modes.	<u>General comment re: joint user agreements</u> No change proposed <u>Accessibility requirements for new learning and non-residential institutions</u> No change proposed	<u>General comment re: joint user agreements</u> Noted and agreed. <u>Accessibility requirements for new learning and non-residential institutions</u> Example understood and agreed.
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	them to travel by walking, cycling and public transport. <u>Loss of learning institutions</u> The restriction that the loss of learning institutions will only be permitted where (inter alia) it can be demonstrated that the use can no longer feasibly be provided in its location could be changed to “feasibly and viably”, to the financial viability of provision is one element of feasibility.	<u>Loss of learning institutions</u> We don’t see that there is a need to explicitly reference viability as stated in the representations, it is already one element of feasibility.	<u>Loss of learning institutions</u> No change proposed	<u>Loss of learning institutions</u> Matter agreed.
C6	<u>(Transport Policy)</u> <u>Reference to improving health outcomes</u> In the first bullet point under ‘Policy context’ it would be positive to add a reference to improving health outcomes along with the other outcomes mentioned here. <u>Reference to County policies/strategies</u> The County Council suggests Policy C6 references the following County policies: the County’s Freight Strategy and the OxRail 2040: Plan for Rail. It is also worth recognising the County are working on delivering an integrated transport policy which will be incorporated	<u>Reference to improving health outcomes</u> Policy HD7: HIA already focuses on Health outcomes and requires a Health Impact Assessment. <u>Reference to County policies/strategies</u> The IDP and other policies in the Plan (e.g., West End and Botley Road Area of Focus - WEBRAOF) already include references to OxRail 2040: Plan for Rail. Having reviewed the County’s Freight Strategy in relation to the sphere of influence for the Local Plan 2045, the Freight Strategy appears to be concerned more with freight	<u>Reference to improving health outcomes</u> No change proposed (as agreed at Reg. 18) <u>Reference to County policies/strategies</u> No change proposed	<u>Reference to improving health outcomes</u> Noted and agreed. <u>Reference to County policies/strategies</u> Noted and agreed.

	into LTCP, this will build upon the Oxfordshire Metro Concept. <u>Vision Led Transport Planning</u> The County Council recommends that C6 incorporates Vision Led Transport Planning as a requirement to ensure Oxford City has the highest quality developments, showing how developers have used Vision Led Transport Planning to achieve sustainable transport infrastructure. <u>Paragraph f)</u> In paragraph 'f)' please replace "Street Design Guide" with "Street Design Code".	movements and routing rather than with specific land use planning issues. Given the city's location in relation to the SRN, it is unlikely that sites exist within the city boundary that are likely to meet road/rail freight distribution centre requirements. As such, we do not consider that a reference to it within Policy C6 is required. <u>Vision Led Transport Planning</u> The NPPF (December 2024) already sets out that a vision-led approach to transport planning should be considered. Having considered whether to make a reference to this in the plan, the City Council considers that National Policy and existing Policy contained within the LTCP is sufficient and does not need to be repeated in the city's Local Plan. <u>Paragraph f)</u> It is our understanding that the Street Design Code has not yet been published. However, when it is it will replace the adopted Street Design Guide. Suggest a minor modification to clarify that any equivalent future standards" should be followed.	<u>Vision Led Transport Planning</u> No change proposed <u>Paragraph f)</u> Update references to Oxfordshire County Council Street Design Guide to future-proof to ensure the most up-to-date standards are referred to. Policy C6 para. f) <i>...and respond to local character and design standards as set out in</i>	<u>Vision Led Transport Planning</u> Noted and agreed. <u>Paragraph f)</u> Update is welcomed and supported.
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	<u>Paragraph h)</u> Within Draft Policy C6, outcome h) including e-bike/e-cargo bike charging would support the growth of e-bikes and e-cargo bikes. <u>LTCP policy reference</u> It would be helpful in Draft Policy C6 if it also references how this policy will support LTCP policy to remove 1 in 4 car trips by 2030 and 1 in 3 by 2040 and reduce vehicle mileage. Travel Plans and TA's should actively show how they will be supporting this policy, this will also support the monitoring of Travel Plans. <u>Travel Plans and health benefits</u> The County Council recommends the following addition to Draft Policy C6: "<u>Travel Plans should incentive sustainable travel and support the delivery of cycle training for children, adults and families to support positive travel choices and provide health benefits to local communities.</u>"	<u>Paragraph h)</u> The plan already includes a policy which references electric vehicle charging. <u>LTCP policy reference</u> The LTCP is the statutory transport plan for Oxfordshire. As such, there is no need to duplicate its content. Especially as this may be subject to change/ review as and when future iterations are delivered. <u>Travel Plans and health benefits</u> The Plan already includes Policy HD7 – Health Impact Assessment to assess impacts of development proposals. The proposed text does not impact the soundness of the plan.	<i>the Oxfordshire County Council Street Design Guide <u>(or future equivalent standards)</u>;</i> <u>Paragraph h)</u> No change proposed (as agreed at Reg. 18) <u>LTCP policy reference</u> No change proposed (as agreed at Reg.18) <u>Travel Plans and health benefits</u> No change proposed.	<u>Paragraph h)</u> Noted and agreed. <u>LTCP policy reference</u> Noted and agreed. <u>Travel Plans and health benefits</u> Noted.
C6	Place Planning and TDM Teams (Central)			

	<u>General comment</u> The County Council fully supports the requirement for transport assessments to assess the multi-modal impacts of development proposals. The County Council's LTCP includes a transport user hierarchy to ensure future schemes consider walking, cycling, public and shared transport before the private car. It is important that development proposals also consider development impacts and any mitigation in this order too. <u>Inclusion of reference to LTCP Policies</u> The County Council notes "<i>The requirements for the transport assessment and travel plans are set out in Oxfordshire County Council's document Implementing Decide and Provide in Transport Assessments.</i>" Whilst this is helpful, it doesn't include this text in the policy wording itself. We think it would be incredibly helpful if specific reference to the County's Implementing Decide and Provide was included and worded as follows:	<u>General comment</u> General comment noted <u>Inclusion of reference to LTCP Policies</u> The LTCP is the statutory transport plan for Oxfordshire. As such, no need to duplicate its content. Especially as this may be subject to change/ review when the next iteration is delivered.	<u>General comment</u> No change proposed (as at Reg. 18) <u>Inclusion of reference to LTCP Policies</u> No change proposed (as at Reg. 18)	<u>General comment</u> N/A <u>Inclusion of reference to LTCP Policies</u> The County is of the view that reference to the County's Implementing Decide and Provide is important to direct developers to the correct documents that need to be applied for the assessment of planning applications. We remain of the view that reference to this document is valuable for the plan, however
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<i>All major development proposals must demonstrate that the methodology in Oxfordshire County Council’s Implementing Decide and Provide: Requirements for Transport Assessments document has been used to assess the need for infrastructure and provision of transport services.</i> <u>Vision-led approach to transport planning</u> Further to this, the glossary at Annex 2 (p.80) of the NPPF describes a vision-led approach as: <i>...an approach to transport planning based on setting outcomes for a development based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity (often referred to as ‘predict and provide’).</i> When these changes to the NPPF were initially proposed it was stated in the supporting text for the accompanying consultation that (Chapter 8, paragraph 7, MHCLG), <i>“To support the</i>	<u>Vision-led approach to transport planning</u> The NPPF (December 2024) already sets out that a vision-led approach to transport planning should be considered. Having considered whether to make a reference to this in the plan, the City Council considers that National Policy and existing Policy contained within the LTCP is sufficient and does not need to be repeated in the city’s Local Plan.	<u>Vision-led approach to transport planning</u> No change proposed.	it is recognised this would not be a ‘soundness’ matter. <u>Vision-led approach to transport planning</u> Noted.
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	<i>implementation of this updated policy, we will publish updated guidance alongside the policy coming into effect.”</i> At the time of writing, this guidance remains forthcoming. Thus, in the context of this description of the vision-led approach and in lieu of the updated guidance, the Implementing Decide & Provide document should be seen as the methodology that development proposals within Oxfordshire must follow in order to meet the requirement set out in paragraph 118 of the NPPF. However, it is expected that, once the updated guidance is made available, the County’s Implementing Decide & Provide will be complementary to the national guidance and will remain necessary in setting out local requirements to ensure that a vision-led approach to transport planning has been followed.			
C7	County Councillors <u>County Parking Standards</u> The County Council welcomes the reference to the Oxfordshire County Council parking standards however we would like to request	<u>County Parking Standards</u> As the city’s parking standards are required to support decision making, it is helpful for them to be included within an adopted Local Plan. While standards	<u>County Parking Standards</u> No change proposed (as agreed at Reg. 18)	<u>County Parking Standards</u> Although disappointing the explanation provided

	that the wording of the policy is such that it can reflect that these standards will be reviewed on a regular basis. Therefore, we encourage the City Council to make reference to the County Council parking standards with an open wording, noting the need to refer to the County as the Highway Authority for the latest standards, instead of including them as an Appendix to the City Plan. Transport Policy <u>Importance of well-lit and inclusive cycle parking</u> Incorporating the importance of lighting should be added. The paragraph relating to bicycle parking ("Cycle parking should be well designed and well-located, convenient, secure, covered (where possible enclosed) and provide level, unobstructed external access to the street.") should also include that cycle parking must be "inclusive" and "well lit". Modification:	do change from time to time, we need to produce a new local plan every five years so we would be review and update the standards as appropriate. <u>Importance of well-lit cycle parking</u> The policy already makes reference to "well designed", "well-located", and "secure" cycle parking. We consider that the addition of the phrase "well-lit" to the policy is superfluous. Well-lit cycle parking, along with a range of other cycle parking design considerations such as natural surveillance and overlooking are key components of well designed, well-located and secure cycle parking facilities. As such the policy does not need to explicitly make reference to "well-lit" cycle parking.		is considered acceptable and this matter is agreed. <u>Importance of well-lit cycle parking</u> No change proposed <u>Importance of well-lit cycle parking</u> Although disappointing the explanation provided is considered acceptable and this matter is agreed.
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	add the following text (in bold) to the policy: “Cycle parking should be well designed, <u>inclusive</u> and well-located, convenient, secure, <u>well-lit</u>, covered (where possible enclosed) and provide level, unobstructed external access to the street”.	It is worth noting that the County Council’s Street Design Guide also highlights that not all streets require street lighting, providing examples of where the provision of lighting may be detrimental. Examples relevant to Oxford city relate to wildlife and/or bat corridors. <u>Importance of inclusive cycle parking</u> Policy C7 already sets out that cycle parking should be designed to accommodate cycle parking for a wide range of users. There is no need to include the word “inclusive” in the preceding paragraph given the range of user groups to which the policy already applies.	<u>Importance of inclusive cycle parking</u> No change proposed	<u>Importance of inclusive cycle parking</u> Although disappointing the explanation provided is considered acceptable and this matter is agreed.
C8	<u>General comment</u> The current car parking policy for non-residential uses within LP 2036 (policy M3), in the case of the redevelopment of an existing or previously cleared site, was that: <i>“there should be no net increase in parking on the site from the previous level and the Council will seek a reduction where there is good accessibility to a range of facilities”.</i> <u>Increase of Parking</u>	<u>General comment</u> General comment noted. <u>Increase of Parking</u>	<u>General comment</u> No proposed changes (as at Reg. 18) <u>Increase of Parking</u> No proposed changes	<u>General comment</u> N/A <u>Increase of Parking</u> Noted and agreed.

	This requirement, in the case of the redevelopment of an existing or previously cleared site, appears to no longer remain with the level of car parking to be demonstrated through the TA. <u>Retain current policy</u> The County Council fully supports no net increase in car parking in the case of the redevelopment of an existing or previously cleared site and given these can often be in locations which are congested and sensitive to changes in traffic flow. Therefore, the existing policy should be retained. Modification: Retain existing policy that requires no net increase in car parking and for this to be demonstrated through the TA.	Any increase in parking would need to be justified in accordance with a submitted TA. <u>Retain OLP2036 policy</u> The principles set out within Policy C8 (i.e., no additional car parking (except for blue badge and servicing) and to seek a reduction in car parking at accessible sites) apply to all non-residential sites (and factor in their accessibility). We could include a reference to a TAN to provide further technical advice for this policy.	(as at Reg. 18) <u>Retain OLP2036 policy</u> We proposed the following minor modification to the supporting text. Create new (final) bullet point under Policy Implementation Heading: <i><u>Further details may be provided in a Technical Advice Note.</u></i>	<u>Retain OLP2036 policy</u> Reference to TAN to be included in wording of policy. The County Council will continue engaging with the City Council regarding a further TAN on this matter.
I2	Support of this Policy	Support noted	No change proposed	N/A
CBLAOF	Typos/ Clarifications/Syntax etc. Amend the following bullet points as follows: c) A reduction <u>of</u> car parking in line with Policy C8 o) Financial contributions from trip-generating uses within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city's boundaries)	Re: bullet point c), this looks like a missing word. We will update with an appropriate word. o) the addition of the word "and" in this context is not an acceptable change as it seems to unintentionally disaggregate CBL from "other sustainable transport measures..." Change not accepted in this instance	Minor modification proposed to clarify the syntax of bullet point c): <i><u>c) A reduction of car parking in line with Policy C8</u></i> No proposed change to bullet point o)	Noted and agreed.

	towards achieving public transport enhancements in this area, including, among other sustainable transport measures, <u>and</u> the delivery of the CBL.			
SPS3	Policy SPS3 – Bertie Place Recreation Ground <u>LNRS mapping extent</u> It is noted that only part, rather than all, of this site is within the mapped area of the LNRS. Modification: update policy box to reflect that part of site is included within the LNRS <u>Consistency with published LNRS</u> Reference to the LNRS should be reviewed now it has been published and updated as appropriate across all allocation sites. <u>Site-specific ecological considerations</u> Suitability for slow worms has been identified for this site. Bats may also be present within the buildings present along with other species such as otters due to the close proximity of a number of watercourses. It is requested that	<u>LNRS mapping extent</u> Having reviewed both the extent of the site allocation and the LNRS mapping, the whole of the Bertie Place LP2045 Site Allocation area is contained within the mapped area of the LNRS mapping. As such, the policy box is accurate. <u>Consistency with published LNRS</u> All site allocations have been reviewed against the final published version of the LNRS. Appropriate references have been included within relevant policies in the Plan. This was done as part of the preparation for Reg. 19. <u>Site-specific ecological considerations</u> All sites were reviewed by relevant city council specialist officers as part of the site allocation process, and their findings incorporated as part of the policy drafting process. We are confident in our approach.	<u>LNRS mapping extent</u> No change proposed <u>Consistency with published LNRS</u> No change proposed <u>Site-specific ecological considerations</u> No change proposed	<u>LNRS mapping extent</u> Agreed. <u>Consistency with published LNRS</u> Agreed. <u>Site-specific ecological considerations</u> Explanation understood. Matter agreed.

	all sites are assessed in this way for their suitability to support protected species if this approach is used here for consistency.			
SPS7	<u>Policy SPS7 Kassam Stadium</u> Reference should be made to all documents that make up the LNRS as well as the mapping tool for all sites, including this one, where applicable.	We consider that the references to the LNRS contained within the site allocation policies to be sufficient.	No change proposed	Agreed.
SPS11	<u>SPS11 Overflow Car Park at Kassam Stadium</u> The Overflow Car Park at Kassam Stadium (Policy SPS11) refers to a minimum capacity of 100 new homes however this is based on a capacity study which assumes a density between 60 – 80dph. Given the site's location and urban nature, the County questions if a density of 80dph on the overall should be applied, in order to maximise the use of the site in line with Policy HD2, thereby reducing the amount of housing unmet need.	See response to H1 (above)	No change proposed	See response to H1.
SPS12/ E1	<u>SPS12 Oxford Science Park</u> It is noted that a number of the proposed allocations in the plan, such as SPS12 (Oxford Science Park) recognises that a level of housing could be acceptable within	<u>Housing at employment sites</u> Some site allocations (e.g., SPS12 Oxford Science Park), are allocated for employment-generating uses. However, Policy E1 – Employment Strategy introduces a permissive approach to	No change proposed	Explanation understood. Matter closed.

	the site however no capacity study or indication of minimum capacity has been undertaken.	residential development across the city's employment site network. While landowners of employment sites generally welcomed the ability to deliver residential uses at their sites, they also supported the flexibility that the permissive approach provided. The City Council considers that the permissive approach to housing on employment sites is the correct approach. This is because it allows landowners to respond quickly to changing economic circumstances (NPPF para. 86(e)). Where housing numbers are included within site allocation policies, these have been through a process in accordance with national policy to ensure that the homes are deliverable within the plan-period. The Housing Requirement already includes a "windfall" allowance for additional homes that are delivered on sites outside of those specifically identified for residential development in the plan. In terms of the anticipated supply calculations for the plan-period, any new homes coming forward on sites identified within the city's employment		
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		site network would be captured as windfalls. The Strategic Housing Land Availability Assessment (SHLAA) sets out how the windfall housing allowance has been factored into the overall capacity calculations. Both small (1-9 dwellings) and large (10+ dwellings) sites make up the overall windfall allowance. The windfall allowance is based on past trends, which have been extrapolated forward. One source of housing within the windfall allowance is conversions from commercial land to housing (including permitted development rights for office to residential conversions). The assumption therefore is that a portion of the windfall housing allowance, both from small and large sites, will come from commercial conversions. We consider that this approach is defensible, justified, and PPG compliant.		
SPS16	<u>Site capacity</u> Although the capacity study prepared for this site acknowledges that there is possibility for additional heights within the site, it is unclear if the	<u>Site capacity</u> The capacity assessment for this site sets out how site capacity (no. of dwellings) has been arrived at. In calculating the residential capacity of the site, higher residential density	<u>Site capacity</u> No change proposed	<u>Site capacity</u> It is understood that the proposed policies in the plan are set as a minimum therefore the site could come

	defined capacity reflects this potential. <u>Policy should contain a reference to supporting a library</u> In addition, consideration should be given to the explicit mention of supporting a library relation into this site as part of the required “Community facilities”. Modification: <i>“Development should include residential development and town centre uses that provide active frontages at ground floor level. The range of town centre uses could include the following:</i> • Retail; • Commercial leisure;	assumptions have been used than those contained within Policy HD2 (i.e., 100dph for city/district centres). The capacity assessment clearly sets out the assumptions for block heights and massing that have been used in coming to the residential capacity for the site. Given the site is less than 4ha and is allocated for a mix of uses including residential, the 500 dwelling (net gain) in residential dwellings at the site represents a very high-density development. <u>Policy should contain a reference to supporting a library</u> The Infrastructure Delivery Plan (IDP) sets out the required infrastructure needed to support the growth identified in the plan. We question the need for library provision on-site, especially given the proximity of the site to Cowley Library (less than 800m away). If improvements to Cowley Library are needed to mitigate the impacts of new development, these should be costed (and identified) in the IDP. However, we can suggest a minor modification to include the phrase ‘and services’, if this would be helpful.	<u>Policy should contain a reference to supporting a library</u> Amend Policy SPS16 to include the phrase ‘and services’ in relation to the community facilities use: <i>“Development should include residential development and town centre uses that provide active frontages at ground floor level. The range of town centre uses could include the following:</i> • Retail... • <u>Community facilities and services;</u>	forward at a higher density subject to other considerations. As such this matter is considered acceptable. <u>Policy should contain a reference to supporting a library</u> In line with the County Council Libraries Asset Development Plan ambitions and principles, we are looking to develop library facilities to ensure we can best/better meet community needs. Although explicit reference to library provision has not been made, it is considered that ‘community
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	• <i>Financial and professional services;</i> • <i>Learning and educational uses;</i> • <i>Evening economy uses such as cafes, restaurants and pubs;</i> • <i>Community facilities; <u>including the potential for library provision.</u></i> <u>Policy should cross-reference Policy HD2</u> <i>The minimum number of dwellings to be delivered is 500 (net gain)".</i> <u>Maximised densities, including for higher buildings, should be demonstrated in line with policy HD2.</u>	<u>Policy should cross-reference Policy HD2</u> There is no need to cross reference Policy HD2 in this policy.	<u>Policy should cross-reference Policy HD2</u> No change proposed	facilities and services' allows flexibility to provide a library depending on local demands and priorities. Matter agreed. <u>Policy should cross-reference Policy HD2</u> Agreed.
SPE2	It is stated that this site has potential for conservation interest. Further detail should be provided to explain this.	A phase one habitat survey was carried out for this site in 2025 and is included in Oxford City Biodiversity Surveys 2025 document. The initial survey found limited biodiversity interest of low distinctiveness. There seem to be no showstoppers to prevent allocation or to influence design, but a more detailed survey will be needed to support any application.	No change proposed	Explanation understood. Matter agreed.
SPE3	A biodiversity survey is stated as required for this site, but this has not been stated as a requirement for all sites. For consistency and in compliance with policy G6, without knowing the details of what is proposed and present at each site	For the draft plan we need to be satisfied that a development is likely to be able to come forward in a way that meets the requirements of the site allocation policy. Ecology officers have carried out a desktop survey of all the site allocations and flagged things that	No change proposed	Explanation understood. Matter agreed.

	allocation, all site allocations may have the suitability to support protected and notable species. It is therefore requested that an ecological assessment is undertaken for all site allocations.	may affect how the sites are delivered, and also cases where further survey work may be needed.		
SPCW6	It is stated that the site contains 'Section 41 (Priority/Principal) habitats'. An ecological assessment of will therefore be required to determine the extent of these habitats and help determine whether the target minimum number of dwellings is achievable in line with policy G6.	We are satisfied that we have understood the constraints on this site in drafting the policy. To accompany an application, a detailed ecological assessment will be required.	No change proposed	Explanation understood. Matter agreed.
SA	<u>Potential for legally protected species</u> Regarding SA objective 10 criteria included in Table 3.14 it is noted that 'Potential for legally protected species to be present' is included in the minor negative section. It should be assumed that all site allocations have the potential to support legally protected species until detailed ecological surveys have been undertaken. This would mean that almost all sites would fall in at least the minor negative category.	<u>Potential for legally protected species</u> As part of the plan-making process, proposed site allocations have been reviewed by specialist officers at the City Council. Where specialist officers considered that sites had the potential for legally protected species to be present, these sites were highlighted, along with a rationale as to why certain species could be present.	<u>Potential for legally protected species</u> No change proposed	Explanation understood. Matter agreed.

	<u>Individual SA site assessment scoring (SA Objective 10)</u> It is noted that a number of site allocations including SPN1 have been assessed as a minor positive impact regarding SA10 despite it being identified that the site may have suitability to support protected species.	<u>Individual SA site assessment scoring (SA Objective 10)</u> The scoring system (SA Framework) that was developed to inform the SA site assessments was consulted on at Reg. 18. (See Interim SA Report – Part One (Scoping) for further details. Table 5.11 of the Interim SA Report sets out the SA decision-making criteria supplements this with site scoring criteria in relation to SA Objective 10. The County Council made no comments on the proposed SA Framework for sites at Reg.18. At the Reg. 19. Consultation Stage, the Reg. 19 SA Report references the SA Framework for sites at Section 3.4.2. The Reg. 19 SA Framework for sites relates decision-making criteria to each SA Objective and then provides scoring criteria that are in turn related to the decision-making criteria. Section 5.3 of the Reg. 19 SA Report includes an account of the SA process involved in the allocation of sites in the plan. Not all sites fall neatly into one of the SA Scoring criteria (e.g. there may be some potential for protected species on a site, but also opportunities for improving wildlife linkages to neighbouring sites). As such, in some instances, City Council planning officers	<u>Individual SA site assessment scoring (SA Objective 10)</u> No changes proposed	<u>Individual SA site assessment scoring (SA Objective 10)</u> Explanation understood. Matter agreed.
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		have needed to apply a degree of professional judgement when assessing each site against the decision-making criteria. In fact, the pro-formas were specifically designed to enable City Council planning officers to be able to set out a short narrative to accompany the scores attributed to relevant SA objectives. The SA site assessment scoring undertaken by City Council planning officers, was informed by additional information from a range of sources. This included in-house advice from specialist officers (including archaeology, land contamination, ecological features and biodiversity potential). The scores, in some instances were also informed by more detailed site-specific information, where this was publicly available.		
	<u>Reference to priority and irreplaceable habitats</u> Reference to priority and irreplaceable habitats as well as priority species would be welcomed when defining the criteria included in Table 3.14 regarding SA10.	<u>Reference to priority and irreplaceable habitats</u> As set out above, the pro-forma was consulted as part of the Reg. 18 Interim SA Report. We are not proposing to update the SA Framework at this stage. It should be noted that these forms are intended to support developing the policies alongside other tools such as the site capacity assessments. Where	<u>Reference to priority and irreplaceable habitats</u> No changes proposed	<u>Reference to priority and irreplaceable habitats</u> Explanation understood. Matter agreed.

	particular areas of recorded habitat/biodiversity value were identified on sites as drafting of the allocations took place, officers have sought to flag this through the allocation's requirements as something applicants will need to consider.		
<u>Reference to LNRS</u> Reference to the LNRS would be welcomed when defining the criteria included in Table 3.14 regarding SA10 and consideration should be given as to whether inclusion of developments within mapped areas of the LNRS are considered positive or negative. Where site allocations fall outside of the mapped areas of the LNRS, the unmapped measures within the LNRS still present an opportunity for ecological enhancements to be delivered in line with strategies' priorities.	<u>Reference to LNRS</u> The individual site allocations policies were reviewed to take account of the LNRS opportunity areas. These have been highlighted in relevant site allocation policies. We do not consider that a site's location within an opportunity area would significantly alter a site's SA score in relation to this objective. Elements of the LNRS layer (i.e., designated ecological sites which are identified as existing sites of biodiversity importance) have already been captured within the assessment process. We are not proposing to alter the SA Framework.	<u>Reference to LNRS</u> No changes proposed	<u>Reference to LNRS</u> Explanation understood. Matter agreed.
<u>Various site scores questioned: Policy SPS8</u> It should be clarified whether SPS8 allocation is a proposed Local Wildlife Site and/or Oxford City Wildlife Site.	<u>Various site scores questioned</u> On various sites, the County Council appears to be disputing the scores attributed through the SA site assessment process. This is not something that is normally debated through the examination process. As	<u>Various site scores questioned</u> No changes proposed	<u>Various site scores questioned</u> Explanation understood. Matter agreed

	<u>Policy SPS14</u> SPS14 is located within 100m of a nationally designated wildlife site and should therefore be assigned minor negative impact regarding SA10. <u>Policy SPE3</u> SPE3 is located within 200m of a Local Wildlife Site and should therefore be assigned neutral impact regarding SA10. <u>Policy SPE5</u> It is noted that the extent of priority lowland deciduous woodland habitat is not yet known within the SPE5 allocation site. This should be confirmed. Clarification should also be provided to explain the phrase 'The site boundary contains Section 41 (Priority/ Principal) habitats that fall within the LPA Biodiversity Duty'. <u>Policy SPE16</u> Under site allocation SPE16 a number of ecological enhancements are listed which appear to be from the LNRS. A consistent approach outlining suitable/possible mapped and unmapped priority measures from	such, we acknowledge the response made on this issue however, no changes are proposed.		
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	the LNRS for each site would be welcomed.			
HRA	<u>Pollutants</u> While it is appreciated that nitrogen oxides and ammonia are important pollutants affecting vegetation, it is requested that other pollutant gases such as sulphur dioxides, ozone and particulates are also acknowledged and considered. This approach also applies to water quality pollutants where only two pollutant types have listed. <u>West Oxfordshire District Council Plans</u> Justification should be provided to explain how West Oxfordshire plans have been considered when assessing in combination effects of air quality and water quantity. <u>Further Justification – Screening Decisions – other SAC's with 10km</u>	<u>Pollutants</u> The HRA Screening Report sets out the rationale for assessing the identified pollutants (both in relation to air and water quality). <u>West Oxfordshire District Council Plans</u> In terms of air quality (traffic modelling) impacts, as the County Council is aware, the development proposed in the extant West Oxfordshire Local Plan is already contained with the Oxfordshire County Council Transport Model. A detailed explanation is provided in the HRA Screening Report (published at Reg. 18 and Appendix A of the Reg. 19 HRA Report). In terms of water quality, the most recent publicly available water cycle studies for all surrounding districts were reviewed as part of the Reg. 19 HRA Report. <u>Further Justification – Screening Decisions – other SAC's with 10km</u>	<u>Pollutants</u> No change proposed <u>West Oxfordshire District Council Plans</u> No change proposed <u>Further Justification – Screening Decisions – other SAC's with 10km</u>	<u>Pollutants</u> Agreed. <u>West Oxfordshire District Council Plans</u> Agreed.

	Further justification should be provided to explain the scoping decision regarding Cothill Fen SAC and Little Wittenham SAC. <u>Further evidence – Recreational impacts buffer zone</u> Further evidence should be provided to justify the scoping decisions made regarding recreational impacts and the distance used of 1,900m, particularly considering how residents may choose to travel to greenspaces through other types of transport other than walking from within Oxford. <u>Further evidence – visitor numbers</u> Further evidence should be provided to justify the conclusion made that ‘There is no indication that current visitor numbers are having a detrimental effect on the condition of <i>Apium repens</i> at the Oxford Meadows SAC’. <u>Section 8.22 - conclusions</u>	The HRA Screening Report already provides evidence as to why these two SACs have been screened out from further assessment. <u>Further evidence – Recreational impacts buffer zone</u> The 1,900m buffer zone is considered suitably precautionary. It was based on a historic study which suggested that people in Oxford were willing to travel to large greenspaces on foot. As <i>A. repens</i> (<i>creeping marshwort</i>) is not sensitive to trampling but is sensitive to increased nutrification associated with dog-fouling, it was considered that most dog-walkers associated with new development choose to walk their dogs (rather than to take their dogs on other modes of transport). This is all set out in the Reg. 19 HRA Report. <u>Further evidence – visitor numbers</u> We consider that the evidence provided in the HRA is sufficient to justify these conclusions. <u>Section 8.22 - conclusions</u>	No change proposed <u>Further evidence – Recreational impacts buffer zone</u> No change proposed <u>Further evidence – visitor numbers</u> No change proposed <u>Section 8.22 - conclusions</u> No change proposed	<u>Further Justification – Screening Decisions – other SAC's with 10km</u> Understood and agreed. <u>Further evidence – Recreational impacts buffer zone</u> Understood and agreed. <u>Further evidence – visitor numbers</u> Understood. Matter closed.
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	Justification and explanation should be provided for the conclusion made in section 8.22.	Paragraph 8.22 considers the water quality 'in-combination' effects and provides a high-level review of published Water Cycle Studies for each of the other Oxfordshire districts. While WWTW capacity issues are noted in all districts, each Oxfordshire district authority has been working with Thames Water to resolve development constraints. <u>Final note on HRA</u> We have involved Natural England at every stage of our HRA and we have a signed statement of common ground with Natural England to support the conclusions presented in the Reg. 19 HRA Report that the Oxford Local Plan 2045 is not likely to have significant effect on the integrity of the Oxford Meadows SAC, either 'alone' or 'in-combination' with other relevant plans and programmes.		<u>Section 8.22 - conclusions</u> Understood. Matter closed. <u>Final note on HRA</u> Understood. Matter closed.
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Table A.2 Oxfordshire County Council (Estates and Property) detailed comments and responses

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed	County Council further response
E1	(OCC Estates and Property) <u>Policy objective (para.1)</u> Paragraph 1 and definitions The County Council supports the objective of the first paragraph of the policy. <u>Employment site categories (paragraph 3/ supporting text)</u> The County Council considers the phrase <i>Existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class)</i> to be lengthy and consequently, impractical and confusing. The County Council suggest re-wording this phrase both within the policy and supporting text as follows: <u>Existing Non-Key employment sites</u> <u>Paragraph 3</u> The County Council supports the aims of paragraph 3, however has proposed some minor modifications to improve clarity and overall application of this	<u>Policy objective (para.1)</u> Support noted. <u>Employment site categories (paragraph 3/ supporting text)</u> The City Council does not support this proposed modification. The suggested phrase ‘Non-Key employment sites’ could be open to a very wide interpretation. For instance, it could be interpreted that the phrase ‘non-key employment site included any other site in the city that was not a Key Employment site. This would mean that any site in the city could be a potentially suitable location for new employment generating uses. While the phrase is lengthy, the City Council considers that it is one which benefits from being precisely worded so as not to create unnecessary loopholes which could be used to deliver increased floorspace for employment-generating uses, when the identified	<u>Policy objective (para.1)</u> No change proposed <u>Employment site categories (paragraph 3/ supporting text)</u> Suggest the following modification to Policy E1 (paragraph 3 Amend 3rd paragraph of the policy as follows: Outside these locations: <u>On existing employment sites or those in lawful uses for the proposed employment use class, which are outside the city or district centres, and which are not designated as Key Employment sites, proposals for regeneration and/or additional floorspace with employment-generating uses will only be supported if:</u> a) Existing employment sites not designated as Key Employment	The proposed amends are considered acceptable. Matter is agreed.

	paragraph in line with the above suggested changes.	needs for these uses can be met through the current policy approach. The City Council has put forward a modification, to highlight that the phrase should be read as a singularity, and to make it less confusing for the County Council.	Sites (or those in lawful use for the proposed employment use class), can only be regenerated with employment generating uses if better and more intensive use is made of the site through the redevelopment, up-grading or re-use of existing under-used buildings; and b) Proposals for additional floorspace for employment generating uses on existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), outside the city and district centres must follow the sequential approach is followed for new town centre uses as set out in Policy C1. No change proposed for supporting text.	
E1	(OCC Property) <u>Paragraph 2: Planning permission will be granted...</u> The County Council has previously expressed their concerns about the use of the phrase “<i>planning permission will be granted</i>”, as it could confuse the decision-maker by giving them the impression that	<u>Paragraph 2: Planning permission will be granted...</u> The City Council notes that it is only within Policy E1 where the County Council has expressed concern about the use of the phrase “<i>planning permission will be granted</i>”, causing potential confusion to decision-makers.	<u>Paragraph 2</u> No change proposed	Explanatory text is welcomed and understood. Matter agreed.

	proposals should be permitted without taking into account instances where material considerations could exist that substantially outweigh the benefits of permitting such a use. The word 'support' is considered more appropriate as it would provide a greater level of flexibility. The County Council proposes that all references to "Planning permission will be granted" within Policy E1 (only) be replaced with general supportive/non-supportive statements to be applied to development proposals.	The City Council does not accept any of the proposed changes from the County Council, which we believe would serve to undermine the plan's focus to support housing delivery. The suite of proposed changes by the County Council to Policy E1 serve collectively to weaken the plan's Employment Strategy by enabling employment-generating uses to come forward across a wider range of sites than the Reg. 19 version of the policy allows for. Whether or not the plan supports or does not support a planning application does not give a clear steer to planning officers in making their report recommendations or elected members when determining planning applications. The County Council's proposed changes could enable employment-generating uses to proliferate across the city.		
E1	<u>Paragraph 4</u> The County Council considers the fourth paragraph to be confusing due to repeating matters addressed in earlier paragraphs and therefore does not add value	<u>Paragraph 4</u> Original Reg. 19 Plan policy text <i>Planning permission will not be granted for proposals for employment generating uses outside the following locations:</i> <i>c) Key Employment Sites;</i>	<u>Paragraph 4</u> No change proposed	Explanatory text is welcomed and understood. Matter agreed.

	to this policy. Accordingly, it is recommended to be deleted. Proposed amendment to paragraph 4 is as follows: Planning permission will not be granted for Development proposals for employment generating uses outside the following locations will not be supported: c) Key Employment Sites; d) the city and district centres; e) existing non-Key employment sites not designated as Key Employment sites (or those in lawful use for the proposed employment use class).	d) the city and district centres; e) existing employment sites not designated as Key Employment sites (or those in lawful use for the proposed employment use class).		
	<u>Paragraph 5</u> The clarification given in the fifth paragraph is also not considered appropriate for inclusion in the policy text, as the classification of employment sites is provided in the supporting text. The County Council suggests retaining the first sentence and deleting the rest of the text. <u>Proposed modification</u> <i>Key Employment Sites are listed in Appendix 3.1 and are shown on the</i>	<u>Paragraph 5</u> Original text as follows: <i>Key Employment Sites are listed in Appendix 3.1 and are shown on the Policies Map. All other employment sites are existing employment sites not designated as Key Employment Sites.</i> It is unclear which test of soundness this proposed modification is based on as the representation in relation to this paragraph suggests that this distinction is covered in the supporting text.	<u>Paragraph 5</u> No change proposed.	Explanatory text is welcomed and understood. Matter agreed.

	<i>Policies Map. All other employment sites are existing employment sites not designated as Key Employment Sites.</i>	While the supporting text frames the categorisation of the two types of employment sites, it does not provide the level of detailed differentiation provided within the policy itself. The City Council does not accept the proposed modification as the policy text provides clear articulation about the specific types of employment sites.		
E1	<u>Paragraph 6</u> The sixth paragraph highlights that development proposals for the conversion of Key Employment sites to residential will only be permitted when the employment use can be maintained and the number of jobs be retained. The County Council raised significant concerns about this part of the draft policy in the Regulation 18 stage, as it was considered too restrictive and lacking the necessary proportionality to ensure there is consistency in decision-making. The Council's position to not permit any loss of jobs is acknowledged and respected. Nonetheless, it is essential to consider adding a degree of proportionality to ensure that this	<u>Paragraph 6</u> <i>Original policy text</i> <i>Loss of employment floorspace and the use of employment sites to support housing delivery</i> <i>Planning permission will not be granted for development that results in a net loss of employment floorspace on Key Employment Sites unless it can be fully justified where:</i> <i>f) The employment use can be maintained; and</i> <i>g) The number of jobs in employment generating uses is retained.</i> The County Council has not suggested a precise percentage of jobs that should be retained or lost should there be a corresponding loss of employment floorspace at Key Employment Sites. Neither was a precise percentage expressed previously.	<u>Paragraph 6</u> No change proposed	Explanatory text is welcomed and understood. Matter agreed.

	draft policy is effective, and decision-makers make consistent decisions. As previously suggested, a “percentage” instead of number of jobs is considered a more appropriate metric as different economic circumstances and needs apply to small, medium and large businesses. Given the aspiration of the Council to retain most, if not all of the jobs, a high percentage could be justifiable and help with unlocking Key Employment Sites for development proposals that deliver similar levels of employment. Proposed modifications: <i>Loss of employment floorspace and the use of employment sites to support housing delivery</i> <i>Planning permission will not be granted for d</i><i>Development proposals</i> that results in a net loss of employment floorspace on Key Employment Sites <i>will not be permitted/supported</i> unless it can be fully justified where: f) The employment use can be maintained; and	The City Council’s position is that the number of jobs in employment generating uses should be retained.		
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	g) The number At least x% of jobs in employment generating uses is retained.			
E1	<u>Paragraph 7</u> The seventh paragraph refers to objectives c) and f) which are currently absent from the draft policy. Accordingly, this will need to be corrected. This paragraph echoes the requirements set out in paragraph eight. It is therefore considered to result in unnecessary duplication. Therefore, it is recommended that it is merged with paragraph eight. County Council suggest deleting paragraph 7 in its entirety. Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory assessment of objectives c) to f)).	<u>Paragraph 7</u> Original text of paragraph 7 is as follows: <i>Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory assessment of objectives c) to f)).</i> The City Council agrees that there was a drafting error in this paragraph and proposes a minor modification to overcome it. This paragraph does not unnecessarily duplicate paragraph eight of the policy. Instead, it sets out that planning permission will be granted for the loss of any existing <i>employment sites not designated as Key Employment Sites</i> to other uses, while proposals for housing will be supported subject to a satisfactory assessment of specified objectives (see proposed minor modification to correctly reference these objectives).	<u>Paragraph 7</u> Update Paragraph 7 to reflect the correct objectives (i.e., objectives h) to m)) <i>Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory assessment of objectives h) to m)e) to f).</i>	Explanatory text and proposed amend is welcomed. Matter agreed.

E1	<u>Paragraph 8</u> Paragraph eight sets out the material planning considerations that will be taken into account when considering development proposals for the redevelopment of Key and non-Key employment sites. OCC recommends a number of modifications to improve clarity, usability of each objective, and make the decision-making test more transparent. <u>Development Proposals involving housing and other uses at Key Employment Sites and on existing non-Key employment sites not designated as Key Employment Sites will only be permitted where they can demonstrate that they have regard to</u> will be assessed by a balanced judgement which will take into account the following objectives: h) Meet as much housing need as possible in sustainable locations...	<u>Paragraph 8</u> Original text of Paragraph 8 sets out that: <i>Proposals involving housing at Key Employment Sites and on existing employment sites not designated as Key Employment Sites will be assessed by a balanced judgement which will take into account the following objectives:</i> <i>h) Meet as much housing need as possible in sustainable locations....</i> Objectives h) to m) of the policy are specifically tailored towards supporting housing delivery and ensuring the continued operation of existing businesses and employment sites. The objectives have been specifically drafted to ensure that, where housing is proposed across the city's employment site network, this results in an appropriate living environment for future residents. The phrase "will be assessed by a balanced judgement..." was introduced by the Local Plan 2036, Planning Inspector to ensure that consideration was given to a suite of objectives which would deliver a suitable environment for any future residents. The LP2045 has retained this extant phrasing to	<u>Paragraph 8</u> No change proposed	Explanatory text is understood. Matter agreed.
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		ensure that proposals involving housing across the city's existing employment site network are considered consistently. Paragraphs 6-8 of Policy E1 work together to establish the conditions where employment floorspace can be lost on Key Employment Sites (para.6), and on existing <i>employment sites not designated as Key Employment Sites</i> (para.7). The policy finally sets out a suite of objectives specifically drafted for proposals involving housing that come forward on sites within the city's exiting employment site network. The policy, as originally drafted, establishes the principle that the complete loss of existing <i>employment sites not designated as Key Employment Sites</i> is allowed, while proposals for housing are supported (subject to a satisfactory assessment of specified objectives). The County Council's proposed changes would effectively make it harder to redevelop existing <i>employment sites not designated as Key Employment Sites</i> for housing (and also introduce unnecessary requirements for other uses proposed on these sites).		
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		For Key Employment sites, the County Council's proposals would serve to support "other uses" on Key Employment Sites while making it harder to bring forward "proposals involving housing" at Key Employment Sites. The County Council's proposal to delete paragraph seven and merge its contents with paragraph eight would result in 'in principle' support for "other uses" on Key Employment Sites.		
G1	(OCC Property) <u>General comment</u> The County Council manages a large number of school playing fields and other sites used for recreational purposes, which are currently designated as "Supporting Green and Blue spaces" under this draft policy. <u>G1b requirements</u> The County Council is concerned that the requirement for the re-provision of similar or higher quality green infrastructure on site can restrict the County Council from discharging its public protection and education duty by improving and expanding	<u>General comment</u> General comment noted. <u>G1b requirements</u> Original text of Policy G1 – G1B: Supporting spaces, states: <i>Planning permission will only be granted for proposals which affect spaces identified a part of the Supporting GI Network where any harm/loss is mitigated by ensuring sufficient</i>	<u>General comment</u> No change proposed <u>G1b requirements</u> No change proposed (as agreed at Reg.18)	<u>General comment</u> N/A <u>G1b requirements</u> Explanation is considered acceptable as the use of wording 'ideally' allows flexibility if evidence is provided that provision on site is not

	recreational spaces and school fields. Paragraph 104 of the NPPF already sets out the circumstances when development proposals for the loss of existing open space, sports and recreational buildings and land will be considered acceptable. These criteria are also currently being proposed to be retained in the draft version of the NPPF, which is currently in consultation. Therefore, and for the sake of enabling sustainable development and adopting a Local Plan that is in general compliance with national policy, the following minor modification is recommended to ensure the tests of soundness are met. Proposed modification: “G1B: Supporting spaces Planning permission will only be granted for proposals which affect spaces identified a part of the Supporting GI Network where any harm/loss is mitigated by ensuring sufficient re-provision, ideally onsite, and to the same standard or higher. These	<i>re-provision, ideally onsite, and to the same standard or higher. These spaces are designated G1B on the policies map.</i> It is important to replace GI/ BI that needs to be re-provided close to where it was lost – the wording guides applicants towards this in the first instance but does not force them to do this. We are not proposing to change this part of the policy.		possible or viable. Matter agreed.
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	spaces are designated G1B on the policies map.”			
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