

Statement of Common Ground between Oxford City Council and Historic England

Submission Draft (Regulation 19) Oxford Local Plan 2045

June 2026

1.0 Introduction

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

1.2 Oxford City Council is producing a new Local Plan covering the period to 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 Local Plan. 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 The legal Duty to Cooperate test was revoked on 25 March 2026 and has been replaced by a policy test whereby plan-making authorities now should demonstrate “effective cooperation”.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 Historic England are the public body that helps people care for, enjoy and celebrate England's historic environment. They are a statutory consultee and a key stakeholder for the Council to work with in regard to maintaining effective cooperation on the new Oxford Local Plan 2045.

2.3 Oxford City Council and Historic England have been engaging closely together throughout the formulation of the Local Plan 2045. Historic England have provided feedback at each of the key stages of Local Plan consultation process, including the Issues Stage (2025), Preferred Options Regulation 18 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 face-to-face or virtual meetings in order to discuss the shaping of policies, the drafting of supporting evidence, and to collaborate and seek 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 Local Plan 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, feedback from Historic England indicated there were a few areas in relation to the draft policies and supporting evidence underpinning them which they considered did not meet the tests of soundness for adoption without additional modification.

2.5 Following the end of the consultation on the 13th March 2026, Oxford City Council and Historic England have been engaging together on the issues which Historic England have identified with the Local Plan and supporting evidence, including via a meeting (taking place 22nd May 2026) as well as via email. The aim of this collaboration has been to identify means of resolving issues flagged by Historic England through their Reg. 19 consultation response, either through modifications to the Local Plan itself or through updates to supporting evidence, in order to reach a point whereby Historic England can support the Local Plan submission without objection.

3.0 Strategic matters

3.1 As set out earlier, a range of comments and suggestions were put forward by Historic England in relation to the policies of the Local Plan through the Reg. 19 consultation. Reference should be made to their letter dated 13th March 2026 for full details, although a summary of all their submitted comments is included in the table set out in Appendix A.

3.2 Historic England raised a limited number of soundness issues in their consultation response, these were focussed on five of the Local Plan's proposed site allocations which Historic England identified as currently being unsound. In particular, Historic England raised concerns with the following site allocation policies:

- Policy SPE6: Land surrounding St Clement's Church
- Policy SPCW2: Botley Road Sites around Cripsey Road including 110 River Hotel and Westgate Hotel
- Policy SPCW6: Manor Place
- Policy SPCW7: Nuffield Sites
- Policy SPCW9: Oxford Railway Station and Becket St Car Park

3.3 For the most part, Historic England set out that they believed these could largely be overcome through changes to policy wording, alongside some additional Heritage Impact Assessments work to support Policy SPCW9 (Oxford Railway Station and Becket St Car Park). Some broader concern was expressed around the approach to SPCW7 (Nuffield Sites), this included a recommendation that the allocation be split into two.

3.4 Comments were also received against a number of other policies in the Local Plan. Whilst these were not identified as soundness issues, Historic England set out that these further comments and recommendations would help to clarify the proposed plan, and support its implementation. These included comments relating to insertion of relevant cross-references where they are missing, as well as minor corrections in cross-referencing where existing policy numbers are incorrect.

3.5 Ongoing dialogue between the two parties since the Regulation 19 consultation has resulted in a number of proposed main or minor modifications to the policies in question which Oxford City Council and Historic England have come to agree would be beneficial changes that could be made to the Local Plan in order to resolve Historic England's identified concerns. A full list of these proposed modifications agreed between the two parties is included in the Table at Appendix A of this statement – as well as

listed in the Schedule of Main Modifications or Schedule of Minor Modifications submitted separately with the full Local Plan submission.

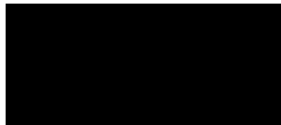
3.6 In relation to the key soundness concerns highlighted under para 3.2 and 3.3, the parties agree that the responses, including proposed modifications, set out in the Appendix would address the concerns raised by Historic England. No outstanding matters of disagreement would remain at time of submission of the Local Plan for examination.

4.0 Concluding remarks/areas of agreement

4.1 Oxford City Council and Historic England have worked closely together throughout the Local Plan preparation process and the subsequent discussions following the Reg.19 consultation. This Statement of Common Ground and the accompanying Appendix set out the changes that the two parties have agreed to in order to overcome the issues and additional recommendations that Historic England had initially identified.

4.2 Whilst this additional work and engagement between the two parties has allowed us to find common ground on all issues, both parties will continue to work together on any others that arise during the examination process, as well as in preparing supporting guidance (such as Technical Advice Notes) in order to help implement the new Local Plan in due course.

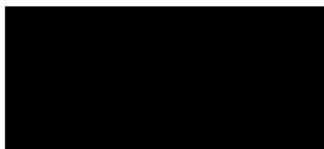
Signed on behalf of Historic England



Title: Alan Byrne, Historic Environment Planning Adviser, Historic England

Date: 30 June 2026

Signed on behalf of Oxford City Council



Title: David Butler, Director of Planning & Regulation, Oxford City Council

Date: 30/06/26

Appendix A - Historic England Regulation 19 feedback and City Council responses

The table in this appendix sets out the City Council's responses and proposed amends to the Local Plan agreed with Historic England to address their Reg 19 comments.

Policy/section	Summary of HE Reg 19 comment	HE Reg 19 suggested change	Oxford City Council response/proposed modification	Type of modification or action
Policy S2: High Quality Design	Policy is considered sound - support reference to the role of heritage in the Council's strategic approach to high quality design.	N/A	Support is noted thanks, no further action proposed.	None
Policy E1: Employment Strategy	HE retain concern about first paragraph on new employment generating uses because this now includes broad reference to sites within the city centre. Would prefer a qualifier indicating that intensification and modernisation may need to be handled sensitively for some sites. Suggest adding "appropriate". Alternative would be a reference to other relevant policies in the plan	Amendments to wording as follows: <i>Planning permission will be granted for the <u>appropriate</u> intensification and modernisation of any Key Employment Site or any employment site in the city centre or district centre.</i>	Whilst we appreciate the concern, the qualifier does not in practice add any additional specificity without defining what we mean by 'appropriate', which will of course vary depending on site context. The policies of the Local Plan need to be read as a whole and other policies of the Local Plan, such as the detail covered throughout chapter 6 should ensure that any intensification/ modernisation is appropriate for the location, including ensuring that any harm to nearby sensitive features is avoided/mitigated through careful design choices. We do not currently propose any further modifications in relation to this comment.	None
Policy R3: retro-fitting existing buildings	Policy is considered sound – HE support this policy, making clear that traditional buildings require a different approach to retrofit measures when compared with adapting modern buildings to improve their carbon and energy efficiency.	N/A	Support is noted thanks, no further action proposed.	None
Policy HD3: designated heritage assets	1. The Reg 19 Local Plan switches terminology to refer to a heritage statement rather than heritage assessment (in previous iterations). HE consider that reference to heritage assessment more accurately reflects the subsequent policy requirement and the direction	Amendments to wording, corresponding to the 3 points made: 1. Policy should reference heritage assessment rather than heritage statement. 2. Amend to criterion b) as follows: <i>That the development of the proposal and its design process have been informed by an</i>	We are happy to agree to the first two points and the modifications suggested by HE as follows: 1. Mod proposed to amend references from heritage statement to heritage assessment throughout the Local Plan (affects multiple policies e.g. HD3, HD4 and HD5). 2. Mods proposed to criteria b) and c) as per the suggestions.	Main mod(s)

	of travel through the draft NPPF consultation 2026. 2. Strongly recommend that the potential for proposals to enhance significance and its appreciation is incorporated into the policy wording. The potential for proposals to deliver other heritage benefits could effectively be incorporated into criterion c. 3. There is no subsection to the policy on scheduled monuments, which is an unnecessary omission that should be rectified. HE suggest additional text for inclusion.	<i>understanding of the significance of the heritage asset including its setting, <u>that enhancements to significance and its appreciation have been identified where possible, and that harm to its significance has been avoided....</u></i> Amend to criterion c) as follows: <i>...and that measures are incorporated into the proposal that mitigate or reduce the harm where appropriate <u>and/or deliver other heritage benefits.</u></i> 3. Additional policy sub-section addressing considerations for Scheduled Monuments and nationally significant Archaeology – see Reg 19 response for suggested wording.	3. Whilst we note the concern about the omission of reference to scheduled monuments in the policy, we would draw your attention to the fact these are referenced in supporting text. Within the policy wording itself, we have tried to focus only on locally specific considerations that do not repeat national policy, but at present, we are struggling to see how the additional wording suggested aligns with this approach. For example, criteria c and d seem to repeat NPPF tests. Equally, within proposed criteria c, the wording about non-designated assets seems to repeat footnote 75 of NPPF (and is already covered at end of HD4). Nevertheless, further to our catch up, we think we could propose a modification that would bring attention to scheduled monuments an cross reference to policy HD5. Modification adding some additional wording to the policy as follows: <i><u>Specific considerations for scheduled monuments</u></i> <i><u>Proposals within the site or setting of scheduled monuments should consider the potential for non-designated heritage assets of archaeological interest, which could be of demonstrably equivalent significance to scheduled monuments. Where present, impacts on these assets will need to be addressed in line with the requirements of Policy HD5 and the NPPF.</u></i>	
Policy HD4: Non-designated heritage assets	Proposed amendment to policy cross reference.	Reference should be made to HD3 rather than HD4 in the final line.	Agree, this is an erroneous reference. Mod proposed to update cross reference from HD4 to HD3 in final para of policy.	
Policy HD5: Archaeology	Proposed amendment to policy cross reference.	Reference should be made to HD3 rather than HD2 and HD4.	Agree, these are erroneous references. Mod proposed to update cross references as follows: <i>Proposals which would or may affect archaeological deposits or features that are designated heritage assets will be considered against the <u>requirements of Policy HD3</u>relevant policy approach (Draft Policy HD2 Listed Buildings, Draft Policy HD4 Scheduled Monuments).</i>	

Policy HD6: Views and building heights	Support for the policy as worded.	N/A	Support is noted thanks, no further action proposed.	
Policy NEOAOF: Northern Edge of Oxford Area of Focus	Proposed amendment to policy cross reference.	Reference should be made to HD6 rather than HD9.	Agree, this is an erroneous reference. Mod proposed to update cross reference from HD9 to HD6 under criterion g) of the policy as follows: <i>Development proposals should be developed in accordance with Policy HD9HD6 and where applicable with the site-specific allocation.</i>	
Policy SPN3: Oxford North Remaining Phases <u>AND VARIOUS OTHER POLICIES</u>	Check policy cross references. Policy SPN1 includes reference to impacts on conservation areas with a cross-reference to HD3. Here, in policy SPN3 they are referenced in the context of HD1. In policy SPS9 reference is made to both HD1 and HD3.	We recommend checking that the Council is comfortable the correct policies are being cited on when considering impacts on the character of conservation areas, in this and other site allocations.	Agree, there are some erroneous references here. Moderations proposed to correct the cross references in the following policies: - SPN3 (HD1 to be changed to HD3 in criterion h) - SPS9 (HD1 ref to be removed from criterion g)	Minor mods
Policy SPN5: Pear Tree Farm	Reference is made to the need for further archaeological investigation only for any “sizable redevelopment”. The meaning is unclear and open to interpretation. Harm to archaeological assets is not necessarily dependent on the size of the development, but its location. A small development in a location that contains important remains will lead to harm.	The wording here needs to be reviewed by the Council’s archaeological adviser and revised.	Agree this wording is unhelpful. Mod proposed as follows: <i>n) This area is of archaeological interest for potential prehistoric and Roman remains, which will require further investigation as part of any sizable redevelopment (Policy HD5).</i>	
Policy CBLOAF: Cowley Branch Line area of focus	We note the different criteria that were included in the OLP2040 Regulation 19 have been dropped, presumably because of the more detailed work that has been done that is embedded in the CBL Density Study. We look forward to the publication of that study. We highlight that impact on views and heritage significance connect with views towards the historic core, not just from the core.	Reference should be made to HD6 rather than HD9. h) Careful consideration given to the design and height of new buildings to ensure that their impact does not have a detrimental impact upon views from <u>or to</u> the historic core, or on surrounding low-rise residential areas. Development proposals should be developed in accordance with Policy HD6 and the site-specific allocation, where applicable ...	Agree with suggested amendments. Moderations to be proposed as follows: <i>h) Careful consideration given to the design and height of new buildings to ensure that their impact does not have a detrimental impact upon views from <u>or to</u>, the historic core, or on surrounding low-rise residential areas. Development proposals should be developed in accordance with Policy HD9HD6 and the site-specific allocation...</i>	

Policy SPS2: ARC Oxford	Proposed policy cross reference	The site allocation policy in OLP2024 Regulation 19 refers to the consideration of impacts within the setting of the adjacent conservation area and listed building (HD1 and HD2). These considerations remain relevant and should be reinstated with a reference to policy HD3.	Propose a mod to add a new criterion under the Urban Design and Heritage section, before the current criterion g) relating to archaeological remains, to read as follows: <u><i>g) Proposals should be designed in a way that is sensitive to the nearby listed building, as well as the Temple Cowley Conservation Area which lies adjacent to the site, particularly regarding heights, massing, roofscape and impacts on local character and street scene (Policy HD3).</i></u> Letters for criteria that follow will need to be updated to account for new one added.	
Policy SPS6: Former Iffley Mead Playing Field	Reference is made to any sizable development requiring pre-determination evaluation.	This wording should be reviewed by the Council's archaeological adviser.	Agree this wording is unhelpful. Mod proposed as follows: <i>e) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (Policy HD5). Any sizable development will require pre-determination evaluation (geophysical survey and trenching).</i>	
Policy SPS7: Kassam Stadium	Support for the policy as worded/	N/A	Support is noted thanks, no further action proposed.	None
Policy SPS10: MINI Plant Oxford	The policy omits reference to HD6 and the CBL Densification Study. While reference is made to blending into surrounding views, the policy needs to connect with both the relevant policy and the 2025 study.	Reference should be made to the CBL Densification Study and HD6	We will propose a mod adding in a reference to the CBL study and High Buildings TAN, however, we do not propose to add a cross-ref to HD6 as this is only flagged in allocations explicitly where there are particular concerns in relation to protected view cones. Whilst HD6 may be of relevance to applications elsewhere in the city, this does not need to be repeated throughout all allocations as the Local Plan's policies need to be read as a whole. Mod to be proposed to criterion e) as follows: <i>e) Whilst there are limited constraints on the site, considerations around heights, scale and massing should factor in how the developments will be viewed from afar and on the approach, so as to reduce feelings of overbearing and dominating of the adjacent streetscape. <u>Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).</u> Variations in materials, including selection of</i>	

			<i>materials and how they are placed, could help to add visual interest to frontages and reduce homogeneity particularly when experienced from outside the site.</i>	
Policy SPS11: Overflow Car Park at Kassam Stadium		Reference should be made to the CBL Densification Study and HD6	We will propose a mod adding in a reference to the CBL study and High Buildings TAN, please see comment against SPS10 explaining why we do not propose to include a cross-ref to HD6 also. Mod to be proposed as follows: <i>h) There is greatest potential for higher and larger plot buildings in front of the railway embankment and in the centre of the site, building in height from the outer edges towards the centre and north of the site. <u>Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).</u></i>	
Policy SPS12: Oxford Science Park		1. Reference should be made to policy HD6 to align with the approach elsewhere in the plan. 2. The allocation should make clear the importance of avoiding harm to any buried remains of Littlemore Priory discovered within the Science Park. 3. Suggest avoiding the implication that proposals should preserve the setting of the Farmhouse, when its significance has been harmed by development within its setting. It would be more appropriate to require proposals to “enhance” the setting.	1. Please see comment against SPS10 explaining why we do not propose to include a cross-ref to HD6. 2. Policy criterion k) does flag the potential for remains associated with Littlemore Priory and cross refers to policy HD5, which we feel addresses that part of your comment sufficiently. 3. We are happy to propose a mod to criterion j as follows: <i>j) Development proposals must be designed to preserve <u>and enhance</u> the setting of the adjoining Grade II* listed Minchery Farmhouse, particularly plots in the east of the site (Policy HD3).</i>	
Policy SPS13: Ozone Leisure Park and Minchery Farmhouse	Welcome the newly drawn boundaries for this site.	The allocation should make clear the importance of avoiding harm to the buried remains of Littlemore Priory. Similar to agreed mods on LP2040, encourage that focus to be integrated within policy SPS13, with potential revised wording as follows: “The heritage significance of Littlemore Priory should inform the design of	We agree some additional detail would be helpful and propose to use similar wording to that of SPS12. We propose a mod to amend criterion J as follows: <i>j) Archaeological potential will need to be explored as part of any proposed redevelopment (Policy HD5). <u>Development proposals must take into consideration the potential presence of Medieval and Roman archaeological remains and remains of Littlemore</u></i>	

		schemes including avoiding harm to buried remains and seeking opportunities to better reveal and appreciate the significance of those remains".	<u><i>Priory. Proposals should ensure that the archaeological assets are appropriately investigated and responded to (Policy HD5).</i></u> We also propose a mod to the 'Notable Heritage Assets' line in the summary box above the policy as follows: <i>Contains Minchery Farmhouse Grade II* listed building. Potential for prehistoric, Roman and medieval archaeology, <u>including remains associated with Littlemore Priory.</u></i>	
Policy SPS15: Sandy Lane Recreation Ground Policy SPS16: Templars Square Policy SPS17: Unipart Site		We recommend referring to the CBL Densification Study (all three sites) and policy HD6 (SPS15 and SPS17).	We will propose mods adding in references to the CBL study and High Buildings TAN, please see comment against SPS10 explaining why we do not propose to include a cross-ref to HD6 for SPS15 and SPS17. Mods to be proposed as follows: SPS15 – Sandy Lane – Amend to criterion i) as follows: <i>i) Whilst the site is in an area of the city with fewer constraints or less sensitivity in terms of views, development proposals will need to consider and mitigate impacts on the sensitive skyline and surrounding area, particularly when viewed in combination with existing and planned development on adjacent sites. This could be achieved in various ways, such as by avoiding built forms with excessively overbearing scale or massing and avoiding roofscapes that are excessively uniform. <u>Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).</u></i> SPS16 – Templars Square – Amend to criterion g) as follows: <i>g) Because of the position of the site on a ridge in an elevated position relative to the city core, there is potential for development to alter views from and to the Historic Core Area (both in the foreground and background of views). Therefore, the townscape and visual impact of any development on views to, across and from the Historic Core Area must be understood, described and explained thoroughly, including with a Visual Impact Assessment, in</i>	

			compliance with Policy HD6. <u>Heights should also be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).</u> SPS17 – Unipart Site – New criterion to be added under Urban Design and Heritage section after existing criterion i), (and criteria after to be re-lettered), as follows: <u>j) Building heights should also be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).</u>	
Policy SPE3: Government Buildings and Harcourt House		Reference should be made to the Headington Hill and St Clements Conservation Areas, as included in the OLP2040 Regulation 19	We have sought to list the key assets of relevance, including these conservation areas, in the info box above the policy box. However, we will propose the following mod: <i>g) Proposals must be designed to be sensitive to their impacts on the significance and setting of the nationally listed and locally listed heritage assets on site and adjacent to it, <u>such as the Headington Hill and St Clements Conservation Areas</u>, taking opportunities to enhance these wherever possible (Policy HD3).</i>	
Policy SPE6: Land surrounding St Clement's Church	Allocation is considered unsound. Unlikely to be effective due to its vague approach to heritage considerations and inconsistent with national policy (NPPF paragraph 203), failing to represent a positive strategy for the historic environment. The policy refers in criterion j) to the need to consider impacts on the significance of "the heritage assets listed [sic] above". This is unnecessarily vague and is open to interpretation, undermining a suitable approach to development in what is a sensitive site. Also, we note the assets referenced (presumably in "Notable heritage assets") do not refer to the adjacent Grade I Registered Park and Garden.	While the policy does provide a welcome steer towards limiting heights, we still recommend a cross reference to policy HD6 (noting the site intersects with a view cone). Wording changes would address our soundness concerns on this policy, making clearer the heritage considerations that need to be taken into account for this allocation.	Mod proposed to the summary info box above the policy, in the notable heritage assets section, as follows: <i>Site surrounds Grade II* listed St Clement's Church. Southern half of the site within South Park View Cone. Within St Clement's and Iffley Road Conservation Area and within setting of Headington Hill Conservation Area. <u>The Grade I Registered Park and Garden Maqdaen College lies adjacent to the site.</u></i> Current criterion n) reflects the additional specificity which we think would address your concerns relating to criterion j). We propose a mod to correct the typo in criterion j), and then to remove and incorporate criterion n) into criterion j). <i>j) Development proposals should be designed with consideration of their impacts on the significance of the heritage assets listed <u>listed</u> above (Policy HD3).</i>	

			<u>Buildings should be arranged in a way that maintains the openness of the riverside setting, that does not compete with the Grade II* listed St. Clement's Church, and is sensitive to the adjacent Registered Park and Garden. Proposals should also maintain the hedge and treeline on the Marston Road and the avenue of trees south of the church that screen it and contribute strongly to the character of its setting.</u> We agree additional reference to the view cone and to HD6 would be useful, and propose a mod to current criterion I) as follows: <i>...Heights should drop towards the Cherwell, to be sympathetic to the relatively rural setting of the river <u>and will also need to be designed with consideration for the view cone which passes through the site (Policy HD6).</u> The green screening...</i>	
Policy SPE11: Oxford Brookes Marston Road Campus	Given the reference to the OHAR in criterion g, it's appropriate surely to cross-refer to HD4?		Agreed, we propose a modification (which also inserts a missing apostrophe in first sentence) as follows: <i>g) Design proposals should acknowledge the Milham Ford School building's status as a local landmark in a historic, social and physical sense. The OHAR designation report highlights the elements that are distinctive to the building and its significance <u>which will be of relevance when addressing potential impacts on this non-designated heritage asset (Policy HD4).</u></i>	
Policy SPE17: Union Street Car Park	The OLP 2040 Regulation 19 refers to the archaeological potential of the site (though incorporating 159 –161 Cowley Road). If there is archaeological potential for Union Street Car Park, this should be acknowledged in the policy with a reference to HD5.		Proposed mod to add detail to the notable heritage assets section in summary box before policy as follows: <i>No designated buildings, spaces or structures on site. Site is within the Crescent Hall View Cone. <u>Some potential for archaeological remains in the area related to former uses as a clay pit and brick yard and in relation to the Civil War Parliamentarian Line.</u></i> Additional criterion to be added under urban design and heritage section as follows:	

			<u>XX) There is also the potential presence of archaeological assets on the site, including in relation to the Civil War Parliamentary Line. Proposals should ensure that these are appropriately investigated and responded to (Policy HD5).</u> Criteria after the new addition above will need to be re-lettered.	
Policy SPCW2: Botley Road Sites around Cripsey Road including 110 River Hotel and Westgate Hotel	Allocation is considered unsound . Inconsistent with national policy. NPPF paragraph 202 acknowledges that heritage assets are an irreplaceable resource, but the policy is silent on the approach anticipated to the non-designated hotels and is missing reference to HD4. The table above the policy states that River Hotel and Westgate hotel are on the Oxford Heritage Asset Register (OHAR); yet the policy does not seek to conserve or enhance the heritage significance of these buildings, it simply requires development needing to understand the significance of the site and its surrounding context.	Ref needed to HD4 Potentially, criteria f and h could be combined. Wording changes would address our soundness concerns on this policy to make explicit the approach to redevelopment of these assets on the OHAR, conserving or enhancing their heritage significance.	We propose the following modification: <i>e) Development proposals should be designed with consideration of their impacts on the setting of the Osney Town Conservation Area (Policy HD3), <u>as well as the non-designated heritage assets identified on the OHAR (Policy HD4).</u></i> We agree that criteria f) and h) could be consolidated. We propose mods to delete criterion h), and update letters of criteria after, and to update criterion f) so it incorporates what was in criterion h) as follows: <i>f) The Boar's Hill view cone covers the entire site allocation. Proposals should be designed in a way that responds to this protected view. <u>Additionally, proposed development that exceeds the height stated in the High Buildings TAN may have an impact on the Historic Core Area and so will be required to provide an LVIA so that the full impacts can be understood and assessed (Policy HD6).</u></i>	
Policy SPCW6: Manor Place	Allocation is considered unsound . Inconsistent with national policy. NPPF paragraph 202 acknowledges that heritage assets are an irreplaceable resource, but the policy is silent on key heritage considerations. It does not represent a positive strategy for the historic environment as worded (paragraph 203).	The policy omits reference to the adjacent RPG (Grade I) and the nearby listed buildings (which also include Grade I assets). We refer to the changes to policy agreed in our signed Statement of Common Ground; implementing those changes in full would address our soundness concerns on this policy.	These additional assets are all listed in the notable heritage assets part of the summary box above the policy, however, we agree that the policy criteria could be improved upon. We propose the following mods: <i>e) The hedged boundaries are an important characteristic of the area and should be retained, as should the mature trees and areas of trees in the northern and southern corners, helping retain the green, semi-rural character of the setting <u>as well as screening the site and providing a buffer to the</u></i>	

			<u>highly graded designated heritage assets within St Catherine's College.</u> Urban Design and heritage f) Development should seek to preserve the special character of the conservation area within which it lies <u>Development proposals must be designed with consideration of their impacts on the setting of the Central Conservation Area, the setting of the nearby listed buildings and views, and the setting of the two adjacent Registered Park and Gardens (Policy HD3).</u> The size, alignment and design of any proposed development should take account of the importance of preserving the visual and physical connections between important, surviving, historic elements. We also, propose a mod to make the summary box, notable heritage assets clearer: <u>...It is adjacent to Magdalen College Grade I Registered Park and Garden and the Landscape at St Catherine's College Grade I Registered Park and Garden....</u>	
Policy SPCW7: Nuffield Sites	Allocation is considered unsound. Inconsistent with national policy. NPPF paragraph 202 acknowledges that heritage assets are an irreplaceable resource, but the policy is silent on key heritage considerations and risks harm to the avoidable harm to the character of the conservation area. It does not represent a positive strategy for the historic environment as worded (paragraph 203). Concerns about the lack of clarity in the vision of what's proposed for these three sites, particularly the site south of St. Frideswide Square. All buildings south of St Frideswide's Square are identified as being positive contributors to the conservation area in the Central	An alternative approach that we believe could resolve our soundness concerns is to separate the site south of Frideswide Square into a separate allocation, which focuses principally on the reuse of assets and acknowledges that they all contribute positively to the conservation area. We would welcome the opportunity to work with the Council on the wording for such a policy. Combining this site with the other two Nuffield sites blurs key issues in an unhelpful way. This would leave the two other sites – the Island site and the car park – which could be grouped together, as they are already. We suggest the following alternative wording for the development of those two sites:	We disagree that the allocation would benefit from being split up, or that this is necessary for soundness; however, we would be happy to propose some further modification to the criteria of the policy in line with your suggestions, as per the below. Modification to be proposed to criteria f) and h) under the urban design and heritage section of the policy as follows: f) <i>Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views (Policy HD6). In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Applications must be supported by a full assessment</i>	

	Conservation Area Appraisal. To include them broadly in site SPCW7 as proposed makes their future very uncertain. Wording of criterion h) is not as clear as it needs to be. Aside from the conservation area, what other designated heritage assets are being incorporated into the development? The supporting Heritage Impact Assessment does not engage in assessing the impacts on significance of relevant heritage assets, presumably because maximum flexibility is sought and there are no scheme designs to consider at this stage.	“h) Development proposals should show how the design of the scheme has been influenced by and has considered the city’s heritage. Proposals should demonstrate <u>how they conserve or enhance the character of the conservation area (in accordance with HD3)</u> and how the existing non-designated heritage assets such as <u>the Royal Oxford Hotel, can will</u> be incorporated into plans to redevelop the site <u>(in accordance with HD4)</u>, or justify an alternative approach.” Furthermore, reference should be made to HD6 in criterion f.	<i>so that the full impacts can be understood and assessed.</i> <i>h) Development proposals should show how the design of the scheme has been influenced by and has considered the city’s heritage. Proposals should demonstrate <u>how they would conserve or enhance the character of the conservation area (Policy HD3)</u> and how the existing designated and non-designated heritage assets, <u>in particular the Royal Oxford Hotel and 18-26 Park End Street, would can</u> be incorporated into plans to redevelop the site, or justify an alternative approach <u>(Policies HD3 and HD4)</u>.</i>	
Policy SPCW8: Osney Mead	In our signed Statement of Common Ground (for Local Plan 2040 preparation), we agreed reference to “the setting of Osney Abbey Scheduled Monument (in accordance with policy HD4), including through design, interpretation and/or enhanced screening, and”.	Recommend this agreed wording (modified to refer to HD3) is integrated.	Upon further reflection, we are unable to identify how development on the Osney Mead site can practically be expected to bring about enhancements to the setting of the scheduled monument. We have also now sought a view from a colleague in the heritage team on this matter and they are in agreement. As such, we do not propose to carry forward this wording.	
Policy SPCW9: Oxford Railway Station and Becket St Car Park	Allocation is considered unsound. Not justified by proportionate evidence. Given the heritage sensitivity of this prominent location at a key entry point to the city, it is vital that the allocation is informed by adequate consideration of heritage impacts. Without such work, the allocation also does not represent a positive strategy for the historic environment (in accordance with paragraph 203).	To be sound, in our opinion, this allocation needs to be informed by heritage impact assessment, and the policy revised to take account of a better understanding of heritage significance and impacts on significance. Cross references are also needed to policies HD3, HD6 and potentially HD4.	We have reviewed and updated the ‘South and east of Oxford Station’ section of the Heritage Impact Assessment so that the area of assessment now incorporates the railway station area more explicitly, alongside the Nuffield Sites. This has highlighted a few extra details in relation to heritage sensitivity which we propose to incorporate into the summary box for the policy and the allocation’s requirements. Mods proposed to update the ‘Notable Heritage Assets’ section of the summary box before the policy to improve accuracy/clarity, as follows: <i>The site is located within the Historic Core Area and within several view cones (in particular, Raleigh Park</i>	

			and Boar's Hill). The site <u>is in close proximity to contains the Central (City and University) Conservation Area to the east, as well as the</u> Scheduled Ancient Monuments of Rewley Abbey (predominantly below ground) and Swing Bridge at Sheepwash Channel. <u>The site is within the setting of several Listed Buildings, including Church of St Thomas the Martyr (Grade II) (directly opposite to the east) and its surrounding churchyard and boundary walls, Combe House (Grade II) and St Thomas Vicarage (Grade II). There are also Oxford Heritage Asset Register (OHAR) assets nearby including the Former Castle Hotel (23 Park End Street), the Sheepwash Channel, and the Westgate Hotel (Botley Road).</u> The southern end of this plot extends into the precinct of Osney Abbey. Moderators proposed to update the 'urban design and heritage' section with an additional criterion, (new criterion should slot in before the existing criterion j), and subsequent criteria re-lettered) to reflect the updates to the Heritage Impact Assessment, as follows: <u>XX) Development proposals should be designed to avoid or mitigate their impacts on the significance and setting of the designated heritage assets nearby including the Central (University and City) Conservation Area, the various listed buildings, and scheduled monuments, as well as the non-designated heritage assets (Policies HD3 and HD4).</u> Mod proposed to add in cross-reference to policy HD6 in criterion i), as follows: <i>i) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views (Policy HD6). In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Prior to undertaking any landscape or visual assessment</i>	
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			<i>work (to support the masterplan-led approach, or development proposals), the key views should be discussed and agreed in advance in writing with the City Council. A full assessment should accompany proposals so that the full impacts can be understood and assessed.</i>	
Policy SPCW12: West Wellington	Query the phrasing of criterion d. The site lies fully within the conservation area, so it would seem remiss not to refer to that explicitly. Is it possible to “incorporate” other designated heritage assets into the scheme? There are no other designated heritage assets within the site. We recommend rewording this criterion.		We propose the following mod to criterion d): <i>d) <u>Development proposals should be designed with consideration for their impacts on the significance and setting of the conservation area and the nearby listed buildings.</u> Proposals should demonstrate how the surrounding designated and non-designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach (Policy HD3).</i>	