

Oxford Local Plan 2045

Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name:

Organisation (if applicable):

Address:

Email:

Date:

Data protection:

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

- ☒ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.
- ☐ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

Do you wish to speak at the examination hearings?

(Please note that the Inspector will decide who to invite to speak)

Yes ☒ No ☒

Do you wish to be notified when:

the Council submit the Oxford Local Plan 2045 to the Government?

☒ ☐

the Inspector's Report is published?

☒ ☐

the Oxford Local Plan 2045 is adopted by the Council?

☒ ☐

GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team

Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team

T: 01865 252847

planningpolicy@oxford.gov.uk

www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**

Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph

Policies Map

Policy Number

Sustainability Appraisal

Q2. Do you consider that the document:

(a) is legally compliant?

☐ Yes

☒ No

(b) is sound?

☒ Yes

☐ No

☐

☐

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?

☐

(c) effective?

☐

(b) justified?

☐

(d) consistent with national policy?

☐

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Planning Policy team
Oxford City Council

Our ref: PL00798071

By email only:
planningpolicy@oxford.gov.uk

Date: 13 March 2026

Dear Planning Policy team

[Covering letter - comments marked up from page 3 onwards \(appendix\)](#)

Oxford Local Plan 2045 Regulation 19 consultation

Thank you for consulting us about the Oxford Local Plan at Regulation 19. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

We welcome the productive discussions with the Council, and the changes made in response to our advice prior to publication of this Regulation 19 consultation. However, we raise soundness concerns about the following proposed allocations:

- 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

For the most part these concerns can be addressed via changes in policy wording, though we flag also our recommendation that SPCW7 be split into two separate allocations (moving the site south of Frideswide Square into its own, separate allocation) and the need for more evidence supporting proposed allocation SPCW9.

In our detailed comments appended, we offer further comments and recommendations that we believe would clarify the proposed plan, and support its implementation, for example:

- Insertion of relevant cross-references where they are missing.
- Minor corrections in cross-referencing where existing policy numbers are incorrect.

We have endeavoured to be constructive in our review and would welcome the opportunity to engage with the Council in preparing a revised Statement of Common Ground to ensure that the Inspector has a clear summary of the latest position. Given my recent change in role, it is likely that these discussions will need to be led from Historic England's perspective by my replacement in due course (or my colleague Alan Byrne in the interim).

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

Guy Robinson, BSc, RTP1

[REDACTED]
on behalf of Development Advice – London and the South East Region
[REDACTED]

Appendix A: Table of Historic England's comments on the Oxford Local Plan 2045 Regulation 19

Policy / Section	Sound/ Unsound	Rationale for soundness concerns	Other comments	Suggested Change
Policy S2: High Quality Design	Sound 81.1	N/A Policy S2. Sound.	We support reference to the role of heritage in the Council's strategic approach to high quality design.	
Policy E1: Employment Strategy	Comment 81.2.	N/A Policy E1. Unsound - Not Justified	We retain a degree of concern about the stark phrasing in the first paragraph on new employment generating uses, especially noting this now includes broad reference to sites within the city centre. Noting the high employment need (to be delivered on existing sites) it would be preferable to add a qualifier indicating that intensification and modernisation may need to be handled sensitively for some sites. We suggest adding "appropriate". The alternative would be a reference to other relevant policies in the plan.	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.

Policy R3: retro-fitting existing buildings	Sound 81.3	N/A Policy R3. Sound	We 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.	
Policy HD3: designated heritage assets 81.4. Policy HD3. Unsound - not justified, not consistent with NPPF	Comment	N/A	We do not object to the consolidation of policy provisions regarding different types of heritage asset into policy. That said, when doing so, the Council has switched its terminology to refer to a heritage statement rather than heritage assessment. We recommend retaining reference to heritage assessment, which more accurately reflects the subsequent policy requirement and the direction of travel through the draft NPPF consultation 2026. Following the same approach articulated in our discussions that informed the signed Statement of Common Ground 2024, we flag	b) That the development of the proposal and its design process have been informed by an understanding of the significance of the heritage asset including its setting, <u>that enhancements to significance and its appreciation have been identified where possible</u>, and that harm to its significance has been avoided or where it's not possible, any harm has been minimised through thoughtful design; and c) That, in cases where development would result in harm to the significance of a heritage asset, the level of harm has been properly and accurately assessed, that alternative designs to respond to heritage constraints and/or opportunities have been explored, and that measures are incorporated into the proposal that mitigate or reduce the harm where appropriate <u>and/or deliver other heritage benefits</u>.

Comments on policy HD3 continued			the potential for proposals to enhance significance and its appreciation. We strongly recommend this is incorporated into the policy wording. In common with our comments at Regulation 18 last summer, we highlight the important potential for proposals to deliver other heritage benefits, which could effectively be incorporated into criterion c. We note there is no subsection to the policy on scheduled monuments and believe it is an unnecessary omission that should be rectified. We suggest additional text for inclusion.	PROPOSED NEW SUBSECTION IN THE POLICY: <u>Specific considerations for Scheduled Monuments and nationally significant Archaeology</u> a) Development must protect the site and setting of Scheduled Monuments or nationally important archaeological remains. b) Nationally important archaeological remains (whether scheduled or demonstrably of equivalent significance) should be preserved in situ. Non-designated archaeological sites or deposits of significance equal to that of a nationally important monument will be assessed as though those sites or deposits are designated. c) Where a proposed development will lead to substantial harm to or total loss of significance of such remains, consent will only be permitted where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. d) Where a development proposal will lead to less than substantial harm to the significance of such remains, this harm will be weighed against the public benefits of the proposal.
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				e) In exceptional cases, where harm to or loss of significance to the asset is considered to be justified, the harm should be minimised, and mitigated by a programme of archaeological investigation, including excavation, recording and analysis. The aim of mitigation should be where possible to preserve archaeological remains in situ, to promote public enjoyment of heritage and to record and advance knowledge. Planning permission will not be granted until this programme has been submitted to, and approved by, the council and development must not commence until these works have been satisfactorily undertaken by an appropriately qualified organisation. The results and analysis of findings subsequent to the investigation must be published and made available to the relevant local and county authorities. Archive will also need to be submitted to the county museum store.
Policy HD4: Non-designated heritage assets	Comment	N/A	81.5. Policy HD4. Unsound - not justified.	Reference should be made to HD3 rather than HD4 in the final line.

Policy HD5: Archaeology	Comment	N/A 81.6. Policy HD5. Unsound - not justified.	Reference should be made to HD3 rather than HD2 and HD4.
Policy HD6: Views and building heights	Sound 81.7 Policy HD6. Sound.	N/A	We support the policy as worded
Policy NEOAOF: Northern Edge of Oxford Area of Focus	Comment 81.8. Policy NEOAOF. Unsound - not justified	N/A	Reference should be made to HD6 rather than HD9
Policy SPN3: Oxford North Remaining Phases	Comment 81.9. Policy SPN3. Unsound - not justified	N/A	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.
Policy SPN5: Pear Tree Farm	Comment 81.10. Policy SPN5. Unsound - not justified	N/A	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.

Policy CBLAOF: Cowley Branch Line area of focus	Comment	N/A	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 Densification 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. Also, 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 <u>9</u> and the site-specific allocation, where applicable ...
81.11. Policy CBLAOF.		Unsound - not justified		
Policy SPS2: ARC Oxford		N/A	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.	
81.12. Policy SPS2.		Unsound - not justified		
Policy SPS6: Former Iffley Mead Playing Field	Comment	N/A	Reference is made to any sizable development requiring pre-determination evaluation. This wording should be reviewed by the Council's archaeological adviser.	
		81.13. Policy SPS6.	Unsound - not justified	

Policy SPS7: Kassam Stadium	Sound	N/A	We support this policy
		81.14. Policy SPS7. Sound	
Policy SPS10: MINI Plant Oxford	Comment	N/A	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.
		81.15. Policy SPS10. Unsound - not justified	
Policy SPS11: Overflow Car Park at Kassam Stadium	Comment	N/A	Reference should be made to the CBL Densification Study and HD6
		81.16. Policy SPS11. Unsound - not justified	
Policy SPS12: Oxford Science Park	Comment	N/A	Reference should be made to policy HD6 to align with the approach elsewhere in the plan. The OLP2040 Regulation 19 states that “there should be no adverse impact on the buried remains of Littlemore Priory”. The proposed new policy simply refers to proposals needing to take those remains into consideration. While policy HD5 is detailed, the allocation should make clear that the importance of avoiding harm to any buried remains of Littlemore Priory discovered within the Science Park. We 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.
		81.17. Policy SPS12. Unsound - not justified	

Policy SPS13: Ozone Leisure Park and Minchery Farmhouse 81.18. Policy SPS13. Unsound - not justified.	Comment	N/A	We warmly welcome the newly drawn boundaries for this site and the potential for a more positive future for Minchery Farmhouse. While policy HD5 is detailed, the allocation should make clear that the importance of avoiding harm to the buried remains of Littlemore Priory. Also, in our signed Statement of Common Ground, we agreed wording that “The heritage significance of Littlemore Priory should inform the design of schemes including seeking opportunities to better reveal and appreciate it.” We 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 schemes including avoiding harm to buried remains and seeking opportunities to better reveal and appreciate the significance of those remains”.
Policy SPS15: Sandy Lane Recreation Ground	Comment	N/A 81.19. Policy SPS15. Unsound - not justified.	We recommend referring to policy HD6 and the CBL Densification Study.
Policy SPS16: Templars Square	Comment	N/A 81.20. Policy SPS16. Unsound - not justified.	Reference should also be made to the CBL Densification Study

Policy SPS17: Unipart Site	Comment	N/A	Reference should also be made to the CBL Densification Study and policy HD6. 81.21. Policy SPS17. Unsound - not justified.
Policy SPE3: Government Buildings and Harcourt House	Comment	N/A	Reference should be made to the Headington Hill and St Clements Conservation Areas, as included in the OLP2040 Regulation 19 81.22. Policy SPE3. Unsound - not justified.
Policy SPE6: Land surrounding St Clement's Church	Unsound	As worded the policy is 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 ilisted [sic] above". This is un-necessarily 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. 81.23. Policy SPE6. Unsound - not effective and inconsistent with NPPF
Policy SPE11: Oxford Brookes Marston	Comment	N/A	Given the reference to the OHAR in criterion g, it's appropriate surely to cross-refer to HD4? 81.24. Policy SPS11. Unsound - not justified.

Road Campus			
Policy SPE17: Union Street Car Park	Comment	N/A 81.25. Policy SPE17. Unsound - not justified	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.
Policy SPCW2: Botley Road Sites around Cripsey Road including 110 River Hotel and Westgate Hotel	Unsound	The proposed allocation is inconsistent with national policy. NPPF paragraph 202 acknowledges that heritage assets are an irreplaceable resource, but the policy is silent on the approach to non-designated heritage assets.	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. 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. 81.26. Policy SPCW2. Unsound - not consistent with NPPF
Policy SPCW6: Manor Place	Unsound	The proposed allocation is inconsistent with national policy. NPPF paragraph 202 acknowledges that	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. 81.27. Policy SPCW6. Unsound - not consistent with NPPF

		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).	
Policy SPCW7: Nuffield Sites 81.28. Policy SPCW7. Unsound - not consistent with NPPF	Unsound	The proposed allocation is 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	As the Council will be aware, we have 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 Conservation Area Appraisal. To include them broadly in site SPCW7 as proposed makes their future very uncertain. We note the policy includes the following criterion: "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 how the existing designated and non-designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach." This wording 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?

Comments on SPCW7 continued		does not represent a positive strategy for the historic environment as worded (paragraph 203).	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. 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: “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 how <u>they conserve or enhance the character of the conservation area (in accordance with HD3) and</u> 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.
Policy SPCW8: Osney Mead	Comment	N/A	In our signed Statement of Common Ground, 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". We recommend this agreed wording (modified to refer to HD3) is integrated.
Policy SPCW9: Oxford Railway Station and Becket St Car Park	Unsound	The allocation is 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. 81.30. Policy SPCW9. Unsound - not justified, not consistent with NPPF
Policy SPCW12: West Wellington	Comment	N/A	We 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.

81.31. Policy SPCW12. Unsound - not justified