Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Joney Ramirez

Organisation (if applicable): Oxfordshire County Council

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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.

	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	○	○
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 use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

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.

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 <u>not</u>: (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

OXFORDSHIRE COUNTY COUNCIL

County Hall
New Road
Oxford
OX1 1ND

Corporate Director of Economy and Place: Robin Rogers

13 March 2026

Planning Policy
Oxford City Council

[redacted]

Dear Planning Policy

Re: Regulation 19 Consultation of the Oxford City Council Local Plan 2045. Closing date 13th March 2026

All the comments made below on the Regulation 19 Local Plan are made on the grounds of soundness. To be sound the Oxford Local Plan 2045 must be:

- **positively prepared -** providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies of the NPPF and other statements of national planning policy, where relevant.

The County Council has reviewed the content of the Regulation 19 Local Plan in relation to Oxfordshire County Council's strategies and policy documents and comments are provided within this letter.

We understand that your current timetable is:

- Submission in June 2026; and
- Adoption by May 2027.

Yours sincerely

[redacted]

Hannah Battye
Head of Placemaking
Email: PlanningInOxfordshire@oxfordshire.gov.uk
www.oxfordshire.gov.uk

Appendix 1

OXFORDSHIRE COUNTY COUNCIL RESPONSE ON OXFORD CITY COUNCIL PREFERRED OPTIONS CONSULTATION (REGULATION 19) THE OXFORD LOCAL PLAN 2045 March 2026

General Comment - no changes proposed

Executive Summary and Overall Position of Oxfordshire County Council

1. The County Council is the Highways Authority and has prepared the Local Transport and Connectivity Plan (LTCP) in accordance with the statutory requirement to do so. The LTCP includes headline targets as follows, and it is expected that the Oxford Local Plan 2045 works alongside the LTCP in order to achieve these targets by reducing the need to travel, discouraging individual private vehicle journeys and making walking, cycling, public and shared transport the natural first choice.

2. By 2030 our targets are to:
   - Replace or remove 1 out of every 4 current car trips in Oxfordshire.
   - Increase the number of cycle trips in Oxfordshire from 600,000 to 1 million cycle trips per week.
   - Reduce road fatalities or life changing injuries by 50%.

3. By 2040 our targets are to:
   - Deliver a net-zero transport network.
   - Replace or remove an additional 1 out of 3 car trips in Oxfordshire.

4. By 2050 our targets are to:
   - Deliver a transport network that contributes to a climate positive future.
   - Have zero, or as close as possible, road fatalities or life-changing injuries.

5. The city of Oxford will change considerably over the lifetime of this Local Plan. A sustainable and reliable transport system is at the heart of the core transport schemes: traffic filters, an expanded zero emission zone and a workplace parking levy. Controlled parking zones, mobility hubs, improved bus services and other measures will also help to change the way that people move around the city. Trains on the Cowley Branch Line serving passengers, with two new stations around the Littlemore area serving the Oxford Science Park, and the Cowley area serving the ARC Oxford Business Park, will provide new travel opportunities and improve accessibility, along with wider improvements to the rail network and a revitalised Oxford Station area. A comprehensive safe cycle network is also part of the vision for delivering a net-zero transport system.

6. 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. We also have

a Climate Action team which is able to provide advice on the climate change emergency. Teams from the different parts of the County Council have contributed to this response.

7. The response has been coordinated by the Strategic Planning team which has also contributed to this response. From a strategic perspective, the County Council is interested to comment on the Local Plans in Oxfordshire in a consistent way about issues which need to be addressed by all, having regard to the interactions between the districts and city.

8. The continued work of the County and City Councils has resulted in significantly reduced comments at this stage of the Plan preparation. There are a number of minor modifications proposed, to ensure consistency between policies and supporting documents.

9. 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. 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 the City Council have been undertaken, it is the County Council's view that this policy undermines County policies and that this matter should be left to specific negotiations between developers and the Councils on a case-by-case basis.

10. The County Council would also like to request that housing capacity is carefully reviewed to ensure that maximum level of housing provision within the City boundaries can be achieved, in particular in areas such as Cowley, Templars Square and Headington where environmental and heritage constraints are less than in other areas. Policies H1 and HD2, alongside the relevant Areas of Focus must be reviewed to ensure maximum densities can be achieved.

11. For Policies S3 and CBLAOF, the County Council is of the view that the policy wording should be strengthened in order to ensure that proportionate contributions can be adequately secured for the delivery of the line, stations and placemaking elements that unlock development.

12. Our detailed comments for each of the policies follow in the next pages and are presented in line with the structure of the consultation document.

Oxfordshire County Council's Response to Oxford City Council Local Plan 2045 Regulation 19 Consultation and Supporting Documents March 2026

1. Introduction and Strategy

Objectives and strategy

No comments as the suggested recommendations at Regulation 18 stage have been taken into account.

Overarching threads

No comments.

Policy S1: Spatial Strategy and Presumption in Favour of Sustainable Development

Strategic Planning

Policy S1 sets out the overall spatial strategy of the Local Plan and builds upon the City Council's overarching threads of 'addressing climate change', 'reducing inequalities', 'enabling a liveable city' and 'securing delivery' and it is under those threads that the policies of the Plan are grouped.

Policy S1 refers to the presumption in favour of sustainable development. The Local Plan will only allocate land for larger developments, but many developments will also be acceptable on smaller sites.

Oxfordshire County Council seeks that the effects of development are mitigated through appropriate conditions, works and contributions to infrastructure. We expect to agree S106 contributions and S278 works in respect of development envisaged in this Local Plan, as well as agreeing the use of Community Infrastructure Levy (CIL) receipts for some infrastructure needs.

Modifications: No changes are requested.

Policy S2: High Quality Design

No comments.

Policy S3: Infrastructure Delivery in New Development

Strategic Planning

Policy S3 and its supporting text are important to the County Council as they set out the requirements for contributions to infrastructure.

The County Council's core schemes involve the introduction of traffic filters, the workplace parking levy and an extended zero emission zone. Those core schemes are being developed together with lots of other transport schemes aimed at improving conditions for active travel in the city.

The transformation of Oxford Railway Station and the re-opening of the Cowley Branch Line to passengers are significant rail projects aimed at improving accessibility. East-West Rail and other line improvements will also help make Oxford more accessible.

The bus network will need to be continually improved. Following a successful bid to government, all-electric buses are starting to be delivered for the Oxford Smart Zone area. Contributions from development will kick-start new and improved routes.

The County Council will continue to work alongside the City Council to provide updates and corrections for the Infrastructure Delivery Plan as information becomes available given that this is a live document.

However, the County Council is of the view that the policy wording should be strengthened in order to ensure that proportionate contributions can be adequately secured for the delivery of the line, stations and placemaking elements that unlock development.In that regard, the following modifications are proposed:

Modifications:

…Planning permission will be granted subject to the provision of (or appropriate funding towards) the required level of infrastructure to support the development through an appropriate financial contribution ***prior to, or in conjunction with, new development.*** Infrastructure identified within the Infrastructure Delivery Plan or through negotiations on individual planning applications will be delivered either through on-site provision or off-site contributions and secured by S106, S278 or other appropriate agreements and the Community Infrastructure Levy (CIL) or its successor as well as other identified sources of funding as set out in the Infrastructure Delivery Plan.

Policy S4: Plan Viability

Strategic Planning

The County Council does not support this policy as this is not in line with the County Council's policies on low carbon and the LTCP's objective of reducing car trips by 1:4 by 2030 and 1:3 by 2040.

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 the City Council have been undertaken, it is the County Council's view that this policy undermines County policies and that this matter should be left to specific negotiations between developers and the Councils on a case-by-case basis.

Modifications: No changes are requested however the County is of the position that this policy should be tested at examination given the potential for this policy to undermine/conflict with County policies. Oxfordshire County Council may need to be at a hearing on this matter.

2. Chapter Two: A Healthy Inclusive City to Live In

Policy H1: Housing Requirement

Strategic Planning
Housing need has been calculated on the NPPF standard method, identifying a need of 1,087homes per annum. The Plan indicates a maximum of 463 homes per annum could be accommodated, including windfall sites and housing allocations. This results on a total unmet need of 12,480 homes within the plan period (624 homes per annum).

It is worth noting that the text of Policy H1 only refers to the requirement within Oxford City and the question of how to deal with unmet need and what the quantum is for each District, will presumably be left to be considered in respect of each of the District Local Plans, and via statements of common ground. It is acknowledged that good progress on this issue has been carried out as part of the Duty to Cooperate discussions.

The County Council has an interest in understanding the total amount of housing need because any new strategic housing allocations are likely to have transport, education and other implications of particular interest in relation to our statutory functions. In particular, we are concerned about growth leading to more vehicle trips, counter to our targets set out in the Local Transport and Connectivity Plan (LTCP), and whether the cost of necessary infrastructure to service 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.

The County Council's position has been, and continues to be, that any site allocations should be well located in relation to the people they are intended to accommodate. Therefore, 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.

In addition, the County Council is of the view that housing capacity needs to be carefully reviewed to ensure that the maximum level of housing provision within the City boundaries can be achieved, in particular in areas such as Cowley, Templars Square and Headington, where environmental and heritage constraints are less than in other areas. Policies H1 and HD2, alongside the relevant Areas of Focus must be reviewed to ensure maximum densities can be achieved.

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 the site however no capacity study or indication of minimum capacity has been undertaken.

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 as 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.

Policy H2: Delivering Affordable Homes

Strategic Planning
Policy H2 sets a requirement for 40% affordable housing on qualifying sites and of 50% on sites in the Green Belt or in sites released from the Green Belt. 80% of those are to be Social Rented and 20% may be provided as intermediate forms of housing.

The need for affordable housing is well known, and it is disappointing that the requirement is being reduced from that in the current Oxford Local Plan 2036 which has a 50% requirement.

On various sites adjoining Oxford there is a requirement for 50% affordable housing. This has mirrored the Oxford Local Plan 2036 requirement. Would the current requirement for 50% affordable housing on sites in Cherwell, South Oxfordshire and West Oxfordshire be undermined by having a 40% affordable housing requirement adopted in Oxford City?.

Modifications: The viability evidence that supports the reduction in affordable housing should be tested at examination. Oxfordshire County Council may not need to be at a hearing on this matter.

Policy H3: Affordable Housing Contributions from Other Development Types
No comments.

Policy H4: Employer-Linked Affordable Housing

Strategic Planning

We welcome the recognition in Policy H4 and some site policies of the need for employer-linked affordable housing in order to provide for some key workers. We can provide further advice if needed about the ongoing need for key workers undertaking multiple social care roles.

Modifications: No changes are requested.

Policy H5: Mix of Dwelling Sizes (Number of Bedrooms)
No comments.

Policy H6: Development Involving Loss of Dwellings
No comments.

Policy H7: Houses in Multiple Occupation
No comments.

Policy H8: Location of New Student Accommodation
No comments.

Policy H9: Linking New Academic Facilities with the Adequate Provision of Student Accommodation

No comments.

Policy H10: Homes for Travelling Communities

No comments.

Policy H11: Homes for Boat Dwellers

No comments.

Policy H12: Older Persons and Other Specialist Accommodation

No comments.

Policy H13: Self-Building and Custom Housebuilding

No comments.

Policy H14: Boarding School Accommodation

No comments.

3. Chapter Three: A Fair and Prosperous City With a Globally Important Role in Learning, Knowledge and Innovation

Policy E1: Employment Strategy

Strategic Planning

Policy E1 indicates the circumstances in which new employment uses will be 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.

Modifications: No changes are requested.

OCC Estates & Property

OCC Property welcomes the changes made to this draft policy to improve its consistency, clarity and overall usability. Notwithstanding this, it is considered that this draft policy still requires further modifications to ensure that the tests of soundness are met.

OCC Property supports the objective of the first paragraph of this draft policy, which seeks to ensure that new development proposals make an efficient use of land and promote sustainable development.

This draft policy classifies employment sites into two categories:

2) Key Employment Sites
2) Existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class).

OCC Property considers the second classification to be lengthy and as a consequence, impractical and confusing. For the sake of improving clarity and conciseness, it is suggested that this is reworded to *"Existing Non-Key employment sites"*. The supporting text is also recommended to be amended accordingly.

The second paragraph provides a framework that sets out when new development proposals for employment generating uses will be supported. OCC Property had previously expressed their concerns about the use of the phrase *"planning permission will be granted"*, as it could confuse the decision-maker by giving them the impression that proposals should be permitted without taking into account instances where material planning considerations could exist that substantially outweigh the benefits of permitting such a use. The word *"support"* is considered to be more appropriate, as it would provide a greater level of flexibility.

The third paragraph sets out the circumstances where employment generating uses on non-Key employment sites outside the city or district centres will be supported. OCC Property supports the aims of this paragraph; however, considers that a few minor modifications are needed to improve clarity and the overall application of this draft policy. These are set out further below.

OCC Property considers the fourth paragraph to be confusing due to repeating matters address in earlier paragraphs, and therefore not add any value to this draft policy. Accordingly, it is recommended to be deleted.

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. OCC Property suggests retaining the first sentence and deleting the rest of the text.

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. OCC Property raised significant concerns about this part of the draft policy in the Regulation 18 stage, as it was considered to be 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 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.

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, and therefore is considered to result in unnecessary duplication. Therefore, it is recommended that it is merged with paragraph eight.

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.

Drawing from all of the above, OCC Property considers that this draft policy requires minor modifications to ensure that the emerging Local Plan meets the tests of soundness by:

1. Setting out a positive approach to protecting employment sites, encouraging new employment generating uses whilst also delivering residential development to meet the growth of the area for the Plan period; and
2. Being in general compliance with national policy which seeks to build a competitive economy, make efficient use of land and support sustainable development in general.

Modifications :

"All new development on employment sites needs to show that it is making the best and most efficient use of land and premises, positively promotes sustainable development and does not cause unacceptable environmental impacts.

New employment generating uses:

~~Planning permission will be granted~~ ***Development proposals*** *for the intensification and modernisation of any Key Employment Site or any employment site in the city centre or district centre* ***will be supported****.*

Outside of these locations:

e) *Existing* ***non-Key*** *employment sites* ~~***not designated as Key Employment 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*

e) *Proposals for additional floorspace for employment generating uses on existing* ***non-Key*** *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 for new town centre uses as set out in Policy C1.*

~~***Planning permission will not be granted for***~~ ***Development*** *proposals for employment generating uses outside the following locations* ***will not be supported****:*

e) *Key Employment Sites;*

e) *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).***~~

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.***~~

Loss of employment floorspace and the use of employment sites to support housing delivery

~~***Planning permission will not be granted for De***~~*velopment* ***proposals*** *that result*~~*s*~~ *in a net loss of employment floorspace on Key Employment Sites* ***will not be permitted/supported*** *unless it can be fully justified where:*

~~***f) The employment use can be maintained; and***~~

~~***g) The number of jobs in employment generating uses is retained.***~~

b) *The employment use can be maintained; and*

b) ***At least x%*** *of jobs in employment generating uses is retained.*

~~***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)).***~~

Development ~~***Pr***~~*oposals 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*** ~~***assessed by a balanced judgement which will take into account***~~ *the following objectives:*

~~***m) Meet as much housing need as possible in sustainable locations;***~~

~~***m) Avoid the loss of, or significant harm to, the continued operation or integrity of successful and/ or locally useful, business and employment sites;***~~

~~***m) Create a pleasant residential environment that provides an acceptable level of amenity for future occupiers;***~~

~~***m) Create a sense of place that is well-connected by safe walking and cycling routes to shops, schools, open spaces, and community facilities and that is well-served by public transport;***~~

~~***m) Secure environmental improvements***~~

~~***m) Avoid locating residential uses in close proximity to existing businesses that may create noise, smells or other potential disturbances as part of the day-to-day operations."***~~

f) Meet as much housing need as possible in sustainable locations;

f) Avoid the loss of, or significant harm to, the continued operation or integrity of successful and/ or locally useful, business and employment sites;

f) Create a pleasant residential environment that provides an acceptable level of amenity for future occupiers;

f) Create a sense of place that is well-connected by safe walking and cycling routes to shops, schools, open spaces, and community facilities and that is well-served by public transport;

f) Secure environmental improvements

f) Avoid locating residential uses in close proximity to existing businesses that may create noise, smells or other potential disturbances as part of the day-to-day operations."

Policy E2: Warehousing, Storage and Distribution Uses

No comments.

Policy E3: Community Employment and Procurement Plans

No comments.

Policy E4: Affordable Workspaces

No comments.

Policy E5: Hotel and Short Stay Accommodation

No comments.

4. Chapter Four: A Green Biodiverse City That is Resilient to Climate Change

Policy G1: Protection of Green Infrastructure

Landscape and Nature Recovery – Biodiversity / Landscape

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. 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.

A focus on connecting green infrastructure features not currently mapped would be welcomed.

Reference to the mitigation hierarchy within this policy regarding G1B and G1C areas would be welcomed where avoidance and mitigation are currently mentioned.

With regards to impacts on trees and woodland, ecological enhancement of existing trees and woodland should also be considered for inclusion. It may 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.

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.

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.

OCC Estates and Property

As explained in our previous representations, OCC Property 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.

OCC Property is concerned that the requirement for the reprovision of similar or higher quality green infrastructure on site can restrict OCC from discharging its public protection and education duty by improving and expanding 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.

Modifications:

*“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 reprovision~~,~~ **~~ideally onsite,~~** and to the same standard or higher. These spaces are designated G1B on the policies map.”*

Policy G2: Enhancement and Provision of New Green and Blue Features

Landscape and Nature Recovery – Biodiversity / Landscape
Reference to the use of Oxfordshire’s Local Nature Recovery Strategy (LNRS) to inform design and decisions is considered key for this policy.

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.

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.

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.

Targets such as percentage canopy cover and a net increase in green infrastructure should be considered for inclusion and would be welcomed.

Policy G3: Provision of New Green and Blue Features- Urban Greening Factor

Landscape and Nature Recovery – Biodiversity / Landscape
We believe 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. 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.

Major development should be defined.

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.

Policy G4: Delivering Mandatory Net Gains in Biodiversity

Landscape and Nature Recovery – Biodiversity

A minimum BNG requirement of 20% is encouraged in line with other emerging local plans in Oxfordshire.

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.

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.

Policy G5: Enhancing Onsite Biodiversity in Oxford

Landscape and Nature Recovery – Biodiversity
Reference to the use of Oxfordshire's Local Nature Recovery Strategy (LNRS) to inform appropriate ecological enhancements is considered key for this policy. The requirement to include an element of native planting is encouraged.

Policy G6: Protecting Oxford's Biodiversity Including the Ecological Network

Landscape and Nature Recovery – Biodiversity
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.

Instead of '*Development proposed on land immediately adjacent to any SSSI must be designed with a buffer to that site'* the proposed wording '*Development proposed on land immediately adjacent to any designated wildlife site or priority habitat must be designed with a buffer to that site or habitat*' would help to ensure that impacts on all designated wildlife sites and priority habitats are captured under this requirement. 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.

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.

Policy G7: Flood Risk and Flood Risk Assessments (FRAs)
No comments.

Policy G8: Sustainable Drainage Systems (SUDS)

Urban design
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.

Policy G9: Resilient Design and Construction

No comments.

5. Chapter Five: A City That Utilises its Resources with Care, Protects the Air, Water and Soil and Aims for Net Zero Carbon

Policy R1: Net Zero Buildings in Operation
No comments.

Policy R2: Embodied Carbon
No comments.

Policy R3: Retro-Fitting Existing Buildings
No comments.

Policy R4: Air Quality Assessments and Standards
No comments.

Policy R5: Water Resources and Quality
No comments.

Policy R6: Soil Quality

Landscape and Nature Recovery – Biodiversity

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.

Policy R7: Land Contamination
No comments.

Policy R8: Amenity Impacts of Developments
No comments.

6. Chapter Six: A City That Respects Its Heritage and Fosters Design of the Highest Quality

Policy HD1: Principles of High-Quality Design
No comments.

Policy HD2: Making Efficient Use of Land
No comments.

Policy HD3: Designated Heritage Assets
No comments.

Policy HD4: Non-Designated Heritage Assets
No comments.

Policy HD5: Archaeology
No comments.

Policy HD6: Views and Building Heights
No comments.

Policy HD7: Health Impact Assessment
Public Health

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.

Policy HD8: Privacy, Daylight and Sunlight
No comments.

Policy HD9: Internal Space Standards for Residential Development
No comments.

Policy HD10: Outdoor Amenity Space

No comments.

Policy HD11: Accessible and Adaptable Homes

No comments.

Policy HD12: Bin and Bike Stores and External Servicing Features

No comments.

7. Chapter Seven: A Liveable City with Strong Communities and Opportunities for All

Policy C1: City, District and Local Centres

Transport Policy

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.

Modification: 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."*

Policy C2: Maintaining Vibrant Centres

Transport Policy

Modifications:

- At the end of the first paragraph of Policy C2, after the phrase "[...] and this should be low car" please add "and have incorporated OCC's Street Design Code."
- In sub-paragraph 'e)', please remove the word "well-located". It could be interpreted in a variety of ways.
- 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."
- While the text mentions tree planting, including incorporation of small green spaces, it is important to still ensure there is some big open/public space for people to dwell, rather than expect everyone to pass through.

Policy C3: Protection, Alterations and Provision of Local Community Facilities

No comments.

Policy C4: Protection, Alteration and Provision of Learning and Non-Residential Institutions

Education

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'*.

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. 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 them to travel by walking, cycling and public transport. 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.

Policy C5: Protections, Alteration and Provision of Cultural Venues and Visitor Attractions

No comments.

Policy C6: Transport Assessments, Travel Plans and Service Delivery Plans

Transport Policy

Modifications:
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.

We suggest 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 into LTCP, this will build upon the Oxfordshire Metro Concept.

We recommend 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.

In paragraph 'f)' please replace "Street Design Guide" with "Street Design Code".

Within Draft Policy C6, outcome h) including e-bike/e-cargo bike charging would support the growth of e-bikes and e-cargo bikes.

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.

We would recommend the following addition to Draft Policy C6: "*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."*

Place Planning and TDM teams (Central)
We fully support 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.

We note this "*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*." 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: *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.*

The latest version of the NPPF published in December 2024, includes the new requirement for development proposals to follow a vision-led approach to transport planning. This is referenced in paragraphs 109 and 115 and in paragraph 118 (p.33), which states: *All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.*

Further to this, the glossary at Annex 2 (p.80) of the NPPF describes a vision-led approach as: …*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')*.

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), "*To support the implementation of this updated policy, we will publish updated guidance alongside the policy coming into effect."* 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.

Modifications: as above.

Policy C7: Cycle and Powered Two Wheelers Parking Design Standards

County councillors

We welcome reference to the County Council parking standards however we would like to request 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.

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: add the following text (in bold) to the policy: *"Cycle parking should be well designed, **inclusive** and well-located, convenient, secure, **well-lit,** covered (where possible enclosed) and provide level, unobstructed external access to the street".*

In addition, 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.

Policy C8: Motor Vehicle Parking Design Standards

Transport Policy
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 "*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"*. 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. 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.

8. Chapter Eight: Infrastructure and New Development

Policy I1: Digital Infrastructure to Support New Development

No comments.

Policy I2 Safeguarding land for infrastructure

Rail

Support of this policy.

Modifications: No modifications required.

Areas of Focus

Northern Edge of Oxford Area of Focus

Policy NEOAOF: Northern Edge of Oxford Area of Focus

No comments.

Policy SPN1: Diamond Place and Ewert House

No comments.
Policy SPN2: Elsfield Hall, Elsfield Way
No comments.

Policy SPN3: Oxford North Remaining Phases
No comments.

Policy SPN4: Oxford University Press Sports Ground, Jordan Hill
No comments.

Policy SPN5: Pear Tree Farm
No comments.

Policy SPN6: Red Barn Farm
No comments.

Cowley Branch Line, Littlemore and The Leys Areas of Focus

Rail
Policy CBLAOF: Cowley Branch Line Area of Focus
C) Amend wording to state 'A reduction of car parking in line with Policy C8'
0) Amend wording to state '(where it falls within the city's boundaries) towards achieving public transport enhancements in this area, including, among other sustainable transport measures AND the delivery of the CBL

Policy SPS1: 474 Cowley Road
No comments.

Policy SPS2: ARC Oxford
No comments.

Policy SPS3: Bertie Place Recreation Ground

Landscape and Nature Recovery – Biodiversity
It is noted that only part, rather than all, of this site is within the mapped area of the LNRS. Reference to the LNRS should be reviewed now it has been published and updated as appropriate across all allocation sites.

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 all sites are assessed in this way for their suitability to support protected species if this approach is used here for consistency.

Policy SPS4: Cowley Marsh Depot
No comments.

Policy SPS5: Crescent Hall
No comments.

Policy SPS6: Former Iffley Mead Playing Field
No comments.

Policy SPS7: Kassam Stadium

Landscape and Nature Recovery – Biodiversity
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.

Policy SPS8: Land at Meadow Lane
No comments.

Policy SPS9: Littlemore Mental Health Centre
No comments.

Policy SPS10: MINI Plant Oxford
No comments.

Policy SPS11: Overflow Car Park at Kassam Stadium
Strategic Planning
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 as 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.

Policy SPS12: Oxford Science Park
Strategic Planning
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 the site however no capacity study or indication of minimum capacity has been undertaken.

Policy SPS13: Ozone Leisure Park and Minchery Farmhouse
No comments.

Policy SPS14: Redbridge Paddock
No comments.

Policy SPS15: Sandy Lane Recreation Ground
No comments.

Policy SPS16: Templars Square

Strategic Planning.

Although the capacity study prepared for this site acknowledges that there is possibility for additional heights within the site, it is unclear if the defined capacity reflects this potential.

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'.

Additional wording within the policy is proposed as follows:

Modification:

"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:
• Retail;
• Commercial leisure;
• Financial and professional services;
• Learning and educational uses;
• Evening economy uses such as cafes, restaurants and pubs;
• Community facilities; ***including the potential for library provision****.*

The minimum number of dwellings to be delivered is 500 (net gain)". ***Maximised densities, including for higher buildings, should be demonstrated in line with policy HD2.***

Policy SPS17: Unipart Site

No comments.

Marston Road and Old Road Areas of Focus

Policy MRORAOF: Marston Road and Old Road Area of Focus

No comments.

Policy SPE1: Churchill Hospital

No comments.

Policy SPE2: East Oxford Bowls Club

Landscape and Nature Recovery – Biodiversity

It is stated that this site has potential for conservation interest. Further detail should be provided to explain this.

Policy SPE3: Government Buildings and Harcourt House

Landscape and Nature Recovery – Biodiversity

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 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.

Policy SPE4: Jesus College Sports Area

No comments.

Policy SPE5: John Radcliffe Hospital
No comments.

Policy SPE6: Land surrounding St Clement's Church
No comments.

Policy SPE7: Lincoln College Sports Ground
No comments.

Policy SPE8: Manzil Way Resource Centre
No comments.

Policy SPE9: Marston Paddock Extension
No comments.

Policy SPE10: Nuffield Orthopaedic Centre
No comments.

Policy SPE11: Oxford Brookes Marston Road Campus
No comments.

Policy SPE12: Rectory Centre
No comments.

Policy SPE13: Ruskin Campus
No comments.

Policy SPE14: Ruskin Field
No comments.

Policy SPE15: Slade House
No comments.

Policy SPE16: Thornhill Park (phase 2)
No comments.

Policy SPE17: Union Street Car Park
No comments.

Policy SPE18: Warneford Hospital
No comments.

University Areas North of the City Centre Areas of Focus

Policy NCCAOF: University Areas North Of The City Centre Area Of Focus

No comments.

Policy WEBRAOF: West End And Botley Road Area Of Focus

No comments.

Policy SPCW1: Banbury Road University Sites – Parcel B

No comments.

Policy SPCW2: Botley Road Sites around Cripley Road including River Hotel and Westgate Hotel

No comments.

POLICY SPCW3: Canalside Land, Jericho

No comments.

Policy SPCW4: Faculty of Music

No comments.

Policy SPCW5: Jowett Walk

No comments.

Policy SPCW6: Manor Place

Landscape and Nature Recovery – Biodiversity

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. Policy SPCW7 – Nuffield Sites

Policy SPCW8 – Osney Mead

No comments.

Policy SPCW9 – Oxford Railway Station and Becket Street Car Park

No comments.

Policy SPCW10: Oxpens

No comments.

Policy SPCW11: St Thomas School and Osney Warehouse

No comments.

Policy SPCW12: West Wellington Square

No comments.

9. APPENDICES

Appendix 1 - 10 All Appendices

- Appendix 1: Strategic Policies and Design Checklist
- Appendix 2: Housing (Affordable Housing Calculations, HMO Calculation, Student Accommodation Thresholds)
- Appendix 3: Employment (Key Employment Sites)
- Appendix 4: Green Biodiverse City (Urban Greening Factor, Biodiversity Points)
  Landscape and Nature Recovery – Biodiversity

  This section should be reviewed as required to ensure alignment with Oxfordshire's LNRS, including the terminology used.

- Appendix 5: Carbon/Resources (Worked Example, Guidance)
- Appendix 6: Design and Heritage (Conservation Areas, Health Impact Assessment Process, Privacy/Daylight/Sunlight Guidelines)
- Appendix 7: Communities (Marketing Expectations, Transport Assessments, Travel Plans, Parking Standards, Shower/Changing Facilities)

Appendix 1- Monitoring Framework

Appendix 2 Regulation 19 Sustainability Appraisal Oxford Local Plan 2045

Landscape and Nature Recovery – Biodiversity

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. 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.

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.

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.

It should be clarified whether SPS8 allocation is a proposed Local Wildlife Site and/or Oxford City Wildlife Site.

SPS14 is located within 100m of a nationally designated wildlife site and should therefore be assigned minor negative impact regarding SA10.

SPE3 is located within 200m of a Local Wildlife Site and should therefore be assigned neutral impact regarding SA10.

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*'.

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 the LNRS for each site would be welcomed.

Appendix 2 Sustainability Appraisal Appendix C - Site Assessments

Appendix 3 Oxford City HRA - Reg 19

Landscape and Nature Recovery – Biodiversity

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.

Justification should be provided to explain how West Oxfordshire plans have been considered when assessing in combination effects of air quality and water quantity.

Further justification should be provided to explain the scoping decision regarding Cothill Fen SAC and Little Wittenham SAC.

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.
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 Apium repens at the Oxford Meadows SAC*'.

Justification and explanation should be provided for the conclusion made in section 8.22.

Appendix 4 Reg 19 Infrastructure Delivery Plan

Appendix 5 Policies map

Appendix 6 OLP 2042 Reg18 Risk Assessment

Appendix 7 EQIA - LP2045 Reg 19