Examination of the Oxford Local Plan 2045 – Stage 2 Hearings: Statement on behalf of Christ Church

Matter: Matter 13: Design and Heritage

Issue: Issue 3: Heritage Assets and Archaeology (Policies HD3, HD4 and HD5)

Hearing Date: 03 December 2026 (Afternoon Session)

The following comments on selected questions in the MIQ's are submitted on behalf of Christ Church (ChCh). ChCh is one of the largest Oxford College's and a significant landowner in the City.

Issue 3: Heritage Assets and Archaeology – Policies HD3, HD4 and HD5

Q1 Are the Plan's heritage policies consistent with the approach to conserving heritage assets in the Framework, having particular regard to the tests in paragraphs 213-216?

1. The Plan's heritage policies are broadly consistent with the NPPF approach to conserving heritage assets.

2. However, Policy HD4 is not fully consistent with paragraph 216 of the NPPF in relation to non-designated heritage assets. Here, the NPPF requires a balanced judgement having regard to the significance of the non-designated heritage asset and the scale of any harm or loss. Policy HD4 instead refers to '*local heritage assets*' and does not replicate the wording of paragraph 216 with sufficient clarity. Consistency with national policy would be improved by replacing references to '*local heritage asset*' with '*non-designated heritage asset*' and amending the policy to state that:

   "*In determining whether planning permission should be granted for a development proposal that affects a* ***non-designated*** ~~*local*~~ *heritage asset* ***a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset****.* ~~*consideration will be given to the significance of the asset the extent of impact on its significance, as well as the scale of any harm or loss to the asset as balanced against the public benefits*~~".

Q2 Are Policies HD3, HD4 and HD5 positively prepared, justified, effective and consistent with national planning policy?

1. Policies HD3 and HD5 are considered positively prepared, justified, effective and consistent with national policy.

2. Policy HD4, as drafted, does not precisely reflect NPPF paragraph 216 regarding decision-making on non-designated heritage assets. Subject to making the proposed amendments identified in ChCh's response to Question 1, Policy HD4 would be effective and fully consistent with national planning policy.

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