

Response ID ANON-M2Q4-48WM-M

Submitted to Oxford Local Plan 2045 Submission Draft (Regulation 19) Consultation
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5 Organisation Name (if applicable)

Organisation:
Garsington Parish Council

6 In what capacity are you responding to this consultation?

Organisation

7 If you are commenting on behalf of someone else, please state their name here. If you are representing more than one person or group we suggest making a separate submission for each.

acting as agent?:

Data Protection Notice and Notification Options

8 Are you happy for the first line of your address and postcode to be published with your response(s)?

I do NOT want my address and postcode to be published with my response.

9 Do you wish to be notified when:

the Council submits the Oxford Local Plan 2045 to the Government?, the Inspector's report is published?

10 If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Please note: while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No

11 If you wish to participate in the hearing session(s), please tell us why you consider this to be necessary. Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

reason to attend hearings:

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

12 Do you consider that policy S1 is sound?

No

13 If you do NOT consider policy S1 to be sound, please select your reasons why from the choices below. Please give precise details for your reasons in the box below - if you wish to support the soundness of the policy please also use this box to set out your comments.

policy is NOT positively prepared, policy is NOT justified

reasons for unsoundness S1:

This policy is focussed on the continued expansion of Oxford City into neighbouring councils, seeking to remove ever more land from the Oxford Green Belt, against the wishes of many residents who currently live here. The City Council professes to be concerned about a housing crisis whilst continuing to expand employment in the City on sites that could be used for council or other affordable housing. This strategy has already seen significant removal of the Oxford Green Belt through the extant plan and is having a detrimental impact on local communities experiencing issues including road congestion, school and healthcare pressures, wastewater contamination in rivers.

Expansion of Oxford City, to replace the green fields around the City with urban sprawl, is entirely a political choice. The housing need figures bear little relation to the current UK birth rate of 1.4 children which is well below the 2.1 needed for a population to sustain itself. However the choices proposed in this plan are to attract evermore people to live and work in Oxford from elsewhere to the detriment of the countryside and existing communities.

If it is truly imperative to grow the Oxfordshire economy, rather than the now unfashionable idea of levelling up across the UK, an alternative approach could be to achieve this through expansion elsewhere in the County away from the City, maintaining the historic setting of Oxford.

Garsington Parish Council contends that this plan does not sufficiently demonstrate exceptional circumstances to justify the imposition of additional housing need on neighbouring councils which will result in further removal of land from the Green Belt.

14 Do you consider that policy S1 is legally compliant? If you do NOT consider policy S1 to be legally compliant, please give precise details for your reasons in the box below - if you wish to support the legal compliance of the policy please also use this box to set out your comments.

Not Answered

S1 legal compliance comments:

15 Please set out, as precisely as possible, what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

changes to make policy s1 sound:

If it is truly imperative to grow the Oxfordshire economy, rather than the now unfashionable idea of levelling up across the UK, an alternative approach could be to achieve this through expansion elsewhere in the County away from the City, maintaining the historic setting of Oxford.

Policy S3: Infrastructure Delivery in New Development

20 Do you consider that policy S3 is sound?

No

21 If you do NOT consider policy S3 to be sound, please select your reasons why from the choices below. Please give precise details for your reasons in the box below - if you wish to support the soundness of the policy please also use this box to set out your comments.

policy is NOT effective

s3 comments:

This policy does not adequately demonstrate that the infrastructure required to support new housing will be delivered in a timely manner.

Local infrastructure constraints include :

- road congestion on radial routes into and out of Oxford
- limited public transport capacity, particularly in rural communities on the outer edge of Oxford
- pressure on schools and health & social care services
- wastewater network capacity

Without clear infrastructure commitments, development risks placing unsustainable pressure on existing communities.

Regarding wastewater, Thames Water continue to report on their website that they are 'finalising plans for a major upgrade at Oxford STW, costing more than £435m. This will provide a significant increase in treatment capacity, larger storm tanks and a higher quality of treated effluent going to the river. We plan to complete this work in early 2032.'

It is our understanding that the funding for all of this work has not been secured and there is a very real risk that development will occur without the essential upgrades to protect our rivers and public health.

22 Do you consider that policy S3 is legally compliant? If you do NOT think policy S3 is legally compliant, please give precise details for your reasons in the box below - if you wish to support the legal compliance of the policy please also use this box to set out your comments.

Not Answered

s3 legal compliance comments:

23 Please set out, as precisely as possible, what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

proposed changes to make policy s3 sound:

Garsington Parish Council would like to see

- A clearer infrastructure delivery plan linked to housing phasing.
- Development to be contingent on infrastructure delivery rather than assumed.

Policy H1: Housing Requirement

33 Do you consider that policy H1 is sound?

No

34 If you do NOT consider policy H1 to be sound, please select your reasons why from the choices below. Please give precise details for your reasons in the box below - if you wish to support the soundness of the policy please also use this box to set out your comments.

policy is NOT positively prepared, policy is NOT justified

h1 comments:

Garsington Parish Council considers that the housing requirement proposed in the plan is not adequately justified.

Oxford is a highly constrained city characterised by Green Belt, floodplain and heritage assets. This plan proposes housing targets significantly above the city's deliverable capacity and relies heavily on development pressure on the urban edge. The Parish Council is concerned that lower impact growth scenarios have not been properly considered.

The absence of agreed Statements of Common Ground suggests to the Parish Council that this plan again fails to demonstrate full compliance with the statutory Duty to Cooperate in relation to the proposed redistribution of unmet housing need to neighbouring districts.

35 Do you consider that policy H1 is legally compliant? If you do NOT consider policy H1 to be legally compliant, please give precise details for your reasons in the box below - if you wish to support the legal compliance of the policy please also use this box to set out your comments.

Not Answered

h1 legal compliance comments:

36 Please set out, as precisely as possible, what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

proposed changes to make h1 sound:

Garsington Parish Council request that alternative scenarios prioritising housing on brownfield sites and urban intensification be fully explored before any consideration of development affecting the Green Belt. If it is deemed imperative that the stated number of new homes is built, then we urge the city of Oxford and larger towns of Oxfordshire to build on a par with other urban conurbations and incorporate a much higher percentage of higher quality, higher density housing ie multi storey blocks of flats. This would place lower cost housing within the reach of first time and early career buyers - the societal group most in need of housing - and result in more social housing. Sprawling estates of low density 3-4 bedroom houses do not meet the most pressing housing needs in society and inevitably result in pressure on non urban communities to provide land for development. Building up and not out would be a forward-thinking, socially and environmentally sustainable corrective to the current, outmoded, practice across Oxfordshire.

The Plan should not proceed until signed Statements of Common Ground demonstrate agreement with neighbouring authorities regarding housing distribution.

The housing requirement should be reviewed and reduced to reflect realistic deliverability within Oxford's constrained geography.