

## Response ID ANON-M2Q4-48W5-V

Submitted to Oxford Local Plan 2045 Submission Draft (Regulation 19) Consultation  
Submitted on 2026-03-13 13:41:21

### Contact Information

#### 1 Name

Name:  
Lynda Moore

#### 2 Email Address

Email:

[REDACTED]

#### 3 Postal Address

postal address:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

#### 4 Postcode

postcode:

[REDACTED]

#### 5 Organisation Name (if applicable)

Organisation:  
CPRE Oxfordshire

#### 6 In what capacity are you responding to this consultation?

Charity or Community Group

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 am happy for the first line of 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?, the Oxford Local Plan 2045 is adopted?

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.

Yes

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:

CPRE give a voice to many who have concerns about:  
Protecting Oxford's Green infrastructure & Green Belt bringing vital social, environmental and economic benefits for a resilient city.

Prioritising land for affordable homes over jobs

Infrastructure issues, including flooding, water and sewage

## 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 effective

reasons for unsoundness S1:

CPRE support the intent of Policy E1, to allow the use of employment space for housing delivery, although we feel the policy is too restrictive and discuss this in our response to policy E1.

Policy S1 e is contradictory to this Policy "Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere;". The wording " prioritising housing elsewhere" must be excluded from this policy if Policy E1 is to be effective.

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:

S1 e " prioritising housing elsewhere" should be deleted

## Policy H1: Housing Requirement

33 Do you consider that policy H1 is sound?

Not Answered

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.

h1 comments:

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:

## Policy H2: Delivering Affordable Homes

37 Do you consider that policy H2 is sound?

Not Answered

38 If you do NOT consider policy H2 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.

h2 soundness comments:

CPRE support the alterations made to this Policy since the reg 18 stage, in particular the exclusion of the wording "provisional requirement, subject to further viability testing".

The stronger wording and definition of "truly affordable in the context of the Oxford housing market" must remain unaltered. We would seek that the word "should" would be better replaced with "Will or Must", to further strengthen this policy.

39 Do you consider that policy H2 is legally compliant? If you do NOT consider policy H2 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

h2 legal compliance comments:

40 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.

suggested changes to make h2 sound:

"Should" be replaced with "Must ... or Will"

### Policy E1: Employment Strategy

94 Do you consider that policy E1 is sound?

No

95 If you do NOT consider policy E1 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 effective

E1 comments:

Whilst CPRE support the intent of this policy, to ease the transition of employment sites towards the provision of homes, as written the policy is ineffective and too restrictive.

Criteria f and g of this policy need to be deleted.

CPRE have repeatedly called for some development on various sites listed as Key Employment Sites many of which have sat empty for decades. The worst examples, being the Osney Industrial Estate and the Unipart site but there are many others. For example, there are still empty sites available on the old British Leyland site at ARC Oxford dating from the 1990's and representing now 30 years of being effectively Brownfield sites. If there is no real expectation that these sites will be actively developed then protecting them as Employment sites makes no sense. The City Council have singularly failed to deal with this issue claiming quite wrongly that Oxford is full, ignoring Osney Mead and the many other vacant sites in Oxford.

In CPRE's view the Policy should state that :

"if a site or part thereof has not been used for substantive employment purposes for a period of 10 years or more then it shall not be subject to the Proposals involving housing listed in the Employment strategy and be subject to normal planning requirements for housing development. Car or commercial vehicle storage/ parking would not be regarded as substantive employment. In relation to smaller developments (formerly Category 3 sites) the suggested proposals should not apply."

Further owners should pay enhanced business rates if they fail to redevelop vacant sites.

96 Do you consider that policy E1 is legally compliant? If you do NOT consider policy E1 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

E1 legal compliance comments:

97 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.

suggested changes to make e1 sound:

Criteria f and g of this policy need to be deleted.

## Policy G1: Protection of Green Infrastructure

119 Do you consider that policy G1 is sound?

No

120 If you do NOT consider policy G1 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, policy is NOT consistent with national policy

g1 comments:

NPPF 11 b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses

There is little objective assessment of needs for "other uses". G1 states: "Larger developments are expected to include a proportion of the site as public open space with a mix of uses," but no indication as to how those needs should be determined.

Policy G1 states that "no green space ..is considered surplus" but that permission will be given for construction on GIC sites "if it can be demonstrated in the application that current provision is surplus to requirements." The 2026 Playing Pitch strategy facilitates objective assessment of the need for playing pitches, but OCC has no current recreation policy. There is lots of research on the various benefits of G1, but no indication as to which benefits should be used to determine a quantum above which GI would be considered surplus.

NPPF 32 requires that policies be underpinned by relevant and up-to-date evidence; adequate and proportionate, focused tightly on supporting and justifying the policies concerned. NPPF 16.(d) requires plans policies to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

Policy G1 sets up a hierarchy of spaces, but the criteria for allocating sites on this hierarchy are neither objectively measured or measurable.

- Intensity of use: There is no indication how intensity of use will be quantified. A population-based approach to determining need would be more objective and proportionate than intensity of use.
- Local value: It is not clear how adequate and proportionate evidence could be collected to determine whether a site is delivering insufficient local value.
- Loss will be resisted: Does this mean that, if a local group campaigns to save a GIC site, that it will be re-categorised as GIB?
- Multifunctionality: If a site is both small and assessed as multifunctional, as is the case for some GI in Oxford, will it be placed in GIC because it is small or GIB because it is multifunctional?
- Small: How will it be determined whether a site is too small? Upgrades to big parks are welcome—but they don't replace small neighbourhood play areas that families rely on.

There is a requirement for applicants applying for permission to build on GIB facilities for Parks, accessible greenspace and amenity greenspaces to provide additional evidence that demonstrates consideration of the following:

- i. "The role of the space in supporting people to socialize, take part in informal recreation (particularly where facilities like children/youth play and outdoor gym equipment are present), or as an escape from the urban environment; and
- ii. With reference, where relevant, to an up-to-date green infrastructure/open space study, with particular attention to local need arising from existing deficits of these types of spaces or deprivation in the area."

It is not clear what it means to "demonstrate consideration". Policy G1 states that "The city centre has a deficit of high-quality, accessible playgrounds," it is clear that such a site would enable people to socialise and take part in informal recreation, but it, in the absence of any policy or strategy for recreation, is not clear how this deficit was determined, and how other spaces providing these exact same functions can be downgraded. The use of deprivation as a metric is problematic as data is collected across electoral wards which are not homogenous. Normal working families also need recreation spaces.

Failure to distinguish between different categories of GI mean that it is not clear how G1 achieves consistency with national policy, especially NPPF 104

Onsite reprovion: The City Council will seek for reprovion to be to be the same standard or higher, "ideally onsite". Although this makes some sense for biodiversity, the reprovion of other amenities onsite would mean the area of land would be reduced and so the quantity of provision necessarily reduced.

Quantity or quality: G1 specifies that reprovion can be delivered "quantitatively (like-for-like replacement) or qualitatively (enhancements that improve the functionality and quality of other areas - demonstrated via the Urban Greening Factor or similar methodology)." It is not at all clear what "similar methodology" could be used to improve the functionality and quality of recreation space, or which metric could be used to assess the functionality and quality of recreational space. The requirement for quantitative or qualitative reprovion, echoed by TAN9 conflicts with NPPF 104(b)

Sufficient reprovion: reprovion for category GIB and GIC is to be "sufficient." It is difficult to know what this means, but this would conflict with NPPF 104 requirement for provision to be equivalent or better in quality and quantity.

121 Do you consider that policy G1 is legally compliant? If you do NOT consider policy G1 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

g1 legal compliance comments:

122 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.

suggested changes to make policy g1 sound:

We consider this Policy needs to be rewritten to address the inadequacies we detail above

## Policy G2: Enhancement and provision of new Green and Blue features

123 Do you consider that policy G2 is sound?

No

124 If you do NOT consider policy G2 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 consistent with national policy

g2 comments:

This policy is not positively prepared. Policy G2 does not address the needs of children and young adults. The treatment of recreation space as another sort of green infrastructure means that spaces will be more likely to be multifunctional, but recreation may be a primary function of much GI space in Oxford. In the absence of a local recreation policy, simply requiring spaces to take into account the "Health and wellbeing, including facilitating recreation and play for people of all age groups and abilities and abilities, particularly children and teenagers" is meaningless. If there is no policy, there is no way for an applicant to know what the objectively assessed needs are, and so no way to ensure that those needs are met.

G2 also requires provision to "be tailored to address existing needs or deficiencies in access locally" e.g. "incorporating play features for younger people." Play features for younger people take up much less space, and allow OCC to claim that they are providing better quality facilities in a fraction of the space.

It is also not consistent with national policy.

The current NPPF 104 (b) states "the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location"

Policy G2 only requires replacement provision to be "equally or more accessible" whereas the current NPPF 104(b) requires provision to be in a suitable location. This is important because OCC insist that improving access to an adjacent plot of land will mitigate the loss of 80% of our recreation ground, whereas the Thames Valley Police have long said that the plot of land is not suitable for unaccompanied children. They say it "significantly lacks surveillance, creating significant concern that there will be opportunities for crime and antisocial behaviour to flourish in this area." This will only comply with national policy if the government changes the new NPPF and replaces suitability with accessibility in line with the OCC local plan.

125 Do you consider that policy G2 is legally compliant? If you do NOT consider policy G2 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

g2 legal compliance comments:

126 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.

suggested changes to make g2 sound:

We consider this policy needs to be rewritten to address the inadequacies we detail above

## Policy G8: Sustainable Drainage Systems (SuDS)

147 Do you consider that policy G8 is sound?

Not Answered

148 If you do NOT consider policy G8 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

g8 comments:

The exceptional circumstances in e) need to be set out in detail for this Policy to be effective.

Any new development planned must be able to satisfy OCC that it will not need to discharge surface water to combined sewers and that there is no risk of this happening, for example, by using overflow lakes/ tanks.

We also refer you to comments we make on Policy R5.

149 Do you consider that policy G8 is legally compliant? If you do NOT consider policy G8 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

g8 legal compliance comments:

150 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.

suggested changes to make g8 sound:

### Policy R1: Net Zero buildings in operation

160 Do you consider that policy R1 is sound?

No

161 If you do NOT consider policy R1 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

r1 comments:

CPRE strongly welcomes the move for all new buildings being net zero and fossil fuel free and agrees with the energy hierarchy.

However, for this policy to be effective and enforceable we consider it vital that wording is changed from "All new buildings SHOULD be net zero carbon in operation" to "All new buildings WILL (OR MUST) be net zero carbon in operation"

162 Do you consider that policy R1 is legally compliant? If you do NOT consider policy R1 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

r1 legal compliance comments:

163 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.

suggested changes to make r1 sound:

'All new buildings WILL (OR MUST) be net zero carbon in operation'

### Policy R3: Retro-fitting existing buildings

168 Do you consider that policy R3 is sound?

Yes

169 If you do NOT consider policy R3 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.

170 Do you consider that policy R3 is legally compliant? If you do NOT consider policy R3 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

r3 legal compliance:

171 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.

suggested changes to make r3 sound:

#### Policy R4: Air quality assessments and standards

172 Do you consider that policy R4 is sound?

Yes

173 If you do NOT consider policy R4 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.

r4 comments:

174 Do you consider that policy R4 is legally compliant? If you do NOT consider policy R4 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

r4 legal compliance comments:

175 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.

suggested changes to make r4 sound:

#### Policy R5: Water Resources and Quality

176 Do you consider that Policy R5 is sound?

No

177 If you do NOT consider policy R5 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, policy is NOT effective

r5 comments:

Policy R5 is not fit for purpose , failing on three tests of soundness and much stronger protection is required to maintain at the very least the existing state of our rivers and streams which currently continue to deteriorate. There are basic legal means to do this which should be included in the Policy.

There is a growing appreciation that Thames Water have been actively conspiring to breach the Regulations relating to the discharge of sewage into our rivers and water courses for many years. This was done to avoid the cost of upgrading the infrastructure and to boost the profits of the Company. For this reason and others last year (2025) they were fined £104 million. The idea that Thames Water are a reliable undertaker of waste water disposal is fanciful. Policy R5 and the Sustainability Assessment continues to place misguidedly a huge level of trust in Thames Water to deliver on their promises at the same time as they ask for immunity over environmental crimes as demanded by its creditors.

The City Council as the appropriate planning authority should be requiring details for all new development as to their impact on existing waste water disposal, in particular, the impact on the treatment plant at Sandford which Thames Water states will be upgraded. The situation regarding the upgrade at this plant remains uncertain with Thames Water seemingly in deep financial difficulty and OFWAT to be replaced with another authority. In any case, even on Thames Water's assessment the major works there will not be completed until 2030 so they will continue to dump sewage for the next 4 years.

The wording of Policy R5 as it stands is only likely to worsen an existing problem. OCC seems wrongly to consider that cleaning up Oxford's rivers and water courses is none of their responsibility and they can continue to blame others for the mess we are now in. It is not understood why the Plan requires only a Foul and Surface water drainage strategy for new build residential development of 100 dwellings or more. The problem of foul water discharge is here and now and much smaller developments will have an impact on a heavily overused sewage system. The limit should be set much lower at 10 dwellings or more.

The role of the local planning authority in relation to the discharge of sewage is set out in the case of Barratt Homes Limited vs Dwr Cymru Cyfyngedig (Welsh Water) see Para. 44 of the judgment. Policy R5 should set out that each planning application should be dealt with on its merits so far as the issue of likely discharge of foul water is concerned, for example, if new student accommodation is being planned.

Similarly, all new planning applications must address the issue of water shortages which is clearly going to be a real problem during the time line of the draft plan.

In relation to the improvements at Sandford Treatment works, the stages reached in the promised improvement works should be monitored by the Council and the results made available for public inspection, as part of the suggested Policy. We would also refer to Windrush Against Sewage Pollution who are closely monitoring the situation regarding the stages reached in the promised improvement works which should information also be monitored by OCC. The results obtained should be made available for public inspection as part of the suggested Policy.

178 Do you consider that Policy R5 is legally compliant? If you do NOT consider policy R5 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

No

r5 legal compliance comments:

179 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.

suggested changes to make r5 sound:

As set out in comments relating to soundness above the Policy should be revised and include wording to reflect existing legal means to restrict development where there is a likelihood of increasing the amount of dumping of sewage into our rivers and watercourse. This can be done by imposing suitable planning conditions at the stage where applications are approved by restricting for example the occupation of premises until certain criteria are met.

## Policy HD2: Making Efficient Use of Land

201 Do you consider that policy HD2 is sound?

Yes

202 If you do not consider policy HD2 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.

hd1 comments:

CPRE support this policy and the need to maximise density and the proposed/ suggested density targets stated within it.

However, this Policy and these densities do not seem to then translate to the housing numbers on site specific allocations given later in the Plan . An exercise is required to cross reference the density targets in this policy against the density and home numbers by site allocation , with adjustments made where these are too low.

203 Do you consider that policy HD2 is legally compliant? If you do NOT consider policy HD2 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

hd2 legal compliance comments:

204 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.

suggested changes to make hd2 sound:

## Policy HD3: Designated Heritage Assets

205 Do you consider that policy HD3 is sound?

No

206 If you do not consider policy HD3 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

hd3 comments:

We support the intent of the inclusion of point e "Trees and other landscape features, including backdrops to views", but feel that this is not strong and specific enough.

We propose the addition of the wording " both outwards from the heritage site and inwards from the surrounding countryside to the heritage site"

207 Do you consider that policy HD3 is legally compliant? If you do NOT consider policy HD3 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

hd3 legal compliance comments:

208 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.

suggested changes to make hd3 sound:

On point e we propose the addition of the wording " both outwards from the heritage site and inwards from the surrounding countryside to the heritage site"

### Policy SPS2: ARC Oxford

331 Do you consider that Policy SPS2 is sound?

No

332 If you do NOT consider policy SPS2 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 effective

sps2 comments:

There are errors in the description of this site in the Policy. The Plan does not accord with the description. It fails to mention that there are currently a large car dealership, hotel, gym, and kindergarten on site.

Although some of this site has been built on there are areas which remain vacant and has done so since the 1990's when the old Rover factory was demolished. The rate of new build has slowed down completely and the vacant sites are very much as they were in 2016 when the previous Policy SP10 was written. As it is proving so difficult to develop this site, the requirement to contribute to the cost of a bridge over the proposed railway nearby will discourage developers from building on the vacant sites which seems at odds with the policies in the draft Plan encouraging development of Brownfield sites.

The Council provides no explanation as to why so much of this site has been vacant for so long. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.

CPRE estimate that there are 5 hectares on this site which could be developed as homes.

Policy E1 must be less restrictive to assist this.

333 Do you consider that Policy SPS2 is legally compliant? If you do NOT consider policy SPS2 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

sps2 legal compliance comments:

334 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.

suggested changes to make sps2 sound:

### Policy SPS3: Bertie Place Recreation Ground

335 Do you consider that Policy SPS3 is sound?

Not Answered

336 If you do NOT consider policy SPS3 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, policy is NOT effective

sps3 comments:

CPRE make detailed comment in relation to recreational facilities in our response to Policy G1 and G2.  
It is our view that the inadequacies in these policies impact this site.

There has not been an objective assessment of need for this site.

We consider there are significant omissions and inaccuracies in the Site Capacity Assessment, with Thames Valley police advising that a Multi-Use Games Area should not be located so close to homes. This facility should not be lost or relocated such that it becomes inaccessible to the local community.

CPRE consider this site not appropriate and a prime example of where Policy E1 needs to be strengthened to be effective. See our comments on Policy E1. Homes should be built on vacant , brownfield sites currently allocated for employment, and not on sites such as this.

337 Do you consider that Policy SPS3 is legally compliant? If you do NOT consider policy SPS3 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

sps3 legal compliance comments:

338 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.

suggested changes to make sps3 sound:

#### Policy SPS7: Kassam Stadium

351 Do you consider that Policy SPS7 is sound?

No

352 If you do NOT consider policy SPS7 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 justified, policy is NOT effective

sps7 comments:

The draft Policy states that planning permission will be granted for redevelopment despite the fact that Oxford United Football Club are currently resident at the Stadium and would, if they were forced to leave at the present time , have nowhere to move to.

OUFC have stated that they are "hopeful" that work can start at their proposed stadium site at the Triangle this year but it will be several years before the stadium will be ready even if the necessary funds can be found to build it. The issues of foul-water drainage of the new site have yet to be resolved.

Whilst the likely unavoidable delays are experienced with developing the new site it should be a condition of any planning application that OUFC would be able to stay at the Kassam.

The replacement of local community facilities should also be a condition of any proposed development.

Policy SPS 7 needs changing to take these factors into account.

This site is 6.52 hectares, which could be allocated for homes.  
Policy E1 must be less restrictive to assist this.

353 Do you consider that Policy SPS7 is legally compliant? If you do NOT consider policy SPS7 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

sps7 legal compliance comments:

354 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.

suggested changes to make sps7 sound:

#### Policy SPS8: Land at Meadow Lane

355 Do you consider that Policy SPS8 is sound?

No

356 If you do NOT consider policy SPS8 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, policy is NOT effective

sps8 comments:

It is not positively prepared as

- it fails to mitigate the unacceptable high levels of ecological harm to the Iffley Wood Conservation area.
- Access is difficult and would endanger users of the Principal Quiet Route for Active Travel along Meadow Lane and Church Way.
- The Environment Agency object to this site, in Flood Zone 3

It is not justified and should be rejected due to the high levels of sensitivity and constraints within the site. Local Plan 2036 identifies 15 constraints, the highest number of any site on the new Local Plan.

The site is not effective as it makes no minimum housing allocation (i.e. a 'zero' allocation). The Council is therefore accepting that the site is so constrained that it may be unable to deliver any development in a sustainable and/or policy compliant manner.

CPRE consider this site not appropriate and a prime example of where Policy E1 needs to be strengthened to be effective. See our comments on Policy E1. Homes should be built on the vacant, brownfield sites allocated for employment, and not on sites such as this.

357 Do you consider that Policy SPS8 is legally compliant? If you do NOT consider policy SPS8 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

sps8 legal compliance comments:

358 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.

suggested changes to make sps8 sound:

#### Policy SPS11: Overflow carpark at Kassam Stadium site

367 Do you consider that Policy SPS11 is sound?

No

368 If you do NOT consider policy SPS11 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 justified, policy is NOT effective

sps11 comments:

369 Do you consider that Policy SPS11 is legally compliant? If you do NOT consider policy SPS11 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

sps11 legal compliance comments:

As Part of the Proposed development covered by SPS7 our comments are the same.

The draft Policy states that planning permission will be granted for redevelopment despite the fact that Oxford United Football Club are currently resident at the Stadium and would, if they were forced to leave at the present time , have nowhere to move to.

OUFC have stated that they are “hopeful” that work can start at their proposed stadium site at the Triangle this year but it will be several years before the stadium will be ready even if the necessary funds can be found to build it. The issues of foul-water drainage of the new site have yet to be resolved.

Whilst the likely unavoidable delays are experienced with developing the new site it should be a condition of any planning application that OUFC would be able to stay at the Kassam.

The replacement of local community facilities should also be a condition of any proposed development.

Policy SPS 11 needs changing to take these factors into account.

This site is 2.29 hectares which could be allocated for homes.

Policy E1 must be less restrictive to allow this

370 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.

suggested changes to make sps11 sound:

#### Policy SPS13: Ozone Leisure Park and Minchery Farmhouse

375 Do you consider that Policy SPS13 is sound?

No

376 If you do NOT consider policy SPS13 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 justified, policy is NOT effective

sps13 comments:

As Part of the Proposed development covered by SPS7 our comments are the same.

The draft Policy states that planning permission will be granted for redevelopment despite the fact that Oxford United Football Club are currently resident at the Stadium and would, if they were forced to leave at the present time , have nowhere to move to.

OUFC have stated that they are “hopeful” that work can start at their proposed stadium site at the Triangle this year but it will be several years before the stadium will be ready even if the necessary funds can be found to build it. The issues of foul-water drainage of the new site have yet to be resolved.

Whilst the likely unavoidable delays are experienced with developing the new site it should be a condition of any planning application that OUFC would be able to stay at the Kassam.

The replacement of local community facilities should also be a condition of any proposed development.

Policy SPS 13 needs changing to take these factors into account.

Excluding the facilities in place this site is 3 hectares which could be allocated for homes.

Policy E1 must be less restrictive to allow this

377 Do you consider that Policy SPS13 is legally compliant? If you do NOT consider policy SPS13 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

sps13 legal compliance comments:

378 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.

suggested changes to make sps13 sound:

#### Policy SPS14: Redbridge Paddock

379 Do you consider that Policy SPS14 is sound?

No

380 If you do NOT consider policy SPS14 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

sps14 comments:

CPRE consider that this site has not been positively prepared in relation to achieving sustainable development. Whilst we usually welcome the prioritisation of development on brownfield land over greenfield sites, in this case we are concerned that Redbridge Meadow, until recently designated as green belt, has considerable biodiversity value, both due to the rewilded nature of this site and the undisturbed and dark riverside habitats it provides as part of the Thames blue / green corridor. We have grave concerns construction on this former landfill site containing industrial and commercial waste to a depth of over 6m will disturb contaminants and lead to pollution of the river and groundwater. The site is in immediate proximity to the Iffley floodplain meadow SSSI on the opposite bank of the Mill Stream and despite requesting have no assurance or quantification there will be no adverse impact on the flora and fauna of this protected habitat.

381 Do you consider that Policy SPS14 is legally compliant? If you do NOT consider policy SPS14 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

sps14 legal compliance comments:

382 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.

suggested changes to make sps14 sound:

#### Policy SPS17: Unipart Site

391 Do you consider that Policy SPS17 is sound?

No

392 If you do NOT consider policy SPS17 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 effective

sps17 comments:

An original Policy in the then Local Plan reserving this site solely for employment use was written in 2016 and since then nothing has changed in any meaningful way ; most of the site is either used for vehicle parking or open-air storage. It has been like that since the Pressed Steel Plant closed 40 years ago. It represents a huge failure to redevelop what is effectively a Brownfield site and a large one. Oxford City Council provides no explanation as to why this is. It could have housed the proposed Oxford United Football stadium instead of which the easier option is taken to build this on the Green Belt.

There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes and an affordable homes crisis in the City. It should be stated that residential use of this site is appropriate

This site is 30.63 hectares which could all be allocated for homes.

Policy E1 must be less restrictive to allow this

393 Do you consider that Policy SPS17 is legally compliant? If you do NOT consider policy SPS17 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

sps17 legal compliance comments:

394 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.

suggested changes to make sps17 sound:

### Policy SPE3: Government Buildings and Harcourt House

407 Do you consider that Policy SPE3 is sound?

No

408 If you do NOT consider policy SPE3 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 effective

spe3 comments:

These sites are what are left of old post war Government Buildings and Harcourt House which was where the Oxford County Court was located. Since then the buildings have been allowed to deteriorate and most of the site is vacant or barely used.

It is noteworthy that these two sites have remained vacant for a very long time - at least 20 years They have appeared in Local Plans in that time as Employment and Brownfield sites. However, nothing in practice has changed and the area continues to deteriorate.

This is an attractive spot in a prosperous part of the City, and there is absolutely no reason why they could not have been redeveloped years ago and yet the Council provides no explanation as to why this is. They are entirely suitable for housing. CPRE have suggested in the past, this is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. As this has not been taken up why not a Compulsory Purchase Order. This could and should be included in this Policy.

This site is 2.37 hectares which could all be allocated for homes.

Policy E1 must be less restrictive to allow this

409 Do you consider that Policy SPE3 is legally compliant? If you do NOT consider policy SPE3 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

spe3 legal compliance comments:

410 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.

suggested changes to make spe3 sound:

### Policy SPCW8: Osney Mead

507 Do you consider that Policy SPCW8 is sound?

No

508 If you do NOT consider policy SPCW8 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 effective

spcw8 comments:

This site has been effectively vacant for many years . It is a large Brownfield site close to the centre of Oxford and is convenient for both the town centre and railway station. It should have been redeveloped years ago. If used as housing land it could take all the homes required to meet Oxford's share of housing need.

There appears to be two distinct issues; flooding and contamination. Neither of these are critical. The flood risk which it seems affects the access road, in and out of the site, could be raised and in any case, flooding should be much less once the Oxford Flood Alleviation Scheme (which is well advanced) is in place. It is quite hopeless that these large post-industrial sites continue to remain as they are when one after another sites in the Green Belt, with poor to non-existent public transport links, are identified as necessary for the growth of Oxford. The policy should address the problem of ensuring this site is redeveloped during the currency of this Local Plan and some incentive should be put in place to make this happen and the reverse if it does not happen such as compulsory purchase.

This site is 17.8 hectares , the vast majority if not all of which could be allocated for homes.

Policy E1 must be less restrictive to allow this.

509 Do you consider that Policy SPCW8 is legally compliant? If you do NOT consider policy SPCW8 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

spcw8 legal compliance comments:

510 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.

suggested changes to make SPCW8 sound:

## Sustainability Appraisal

537 Do you wish to comment on a specific part(s) of the Sustainability Appraisal? Please state the relevant section or paragraph reference(s):

references for further comment chap 1:

538 Do you consider the Sustainability Appraisal to be sound?

No

539 Do you consider the Sustainability Appraisal to be legally compliant?

Not Answered

540 Do you consider the Sustainability Appraisal to comply with the duty to cooperate?

Not Answered

541 Please give details, as precisely as possible, of why you consider that the stated part(s) of the Sustainability Appraisal is not legally compliant or is unsound or fails to comply with the duty to co-operate. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

reasons chapter reference is sound or unsound:

542 Please set out what change(s) you consider necessary to make the stated part(s) of the Sustainability Appraisal legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above (please note: non-compliance with the duty to co-operate is incapable of modification at examination). 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. Please be as precise as possible.

suggested changes to make chapter sound:

The Sustainability Appraisal (SA) grossly underestimates the societal, environmental and economic impacts of the Reg 19 Local Plan 2045 and is not based on proportionate evidence.

<https://www.oxford.gov.uk/downloads/file/3913/sustainability-appraisal-oxford-local-plan-2045-reg-19>

The prioritising of economic growth through employment (SA topic 12), stipulated as requirements across LP policies, sends a shock wave of negative impacts across the other 11 SA topics (carbon emissions; resilience to climate change; efficient land use; local housing needs; inequalities; services and facilities; green infrastructure, leisure and recreation; traffic and air pollution; water; biodiversity; good urban design/ the historic environment), which Local Plan policies frame as merely aspirational.

No evidence is provided in the SA to justify the improvements in the colour coded scoring of SA topics from those in the Summary of the current situation and likely future without a plan (Table 1.2) to the Summary of overall impacts of the Local Plan (Table 1.7).

The proposed monitoring framework as set out in Table 1.8 is worthless as it fails to specify any baseline data or targets, any means of delivery or any actions to be taken as a result of this monitoring.

The SA is therefore not justified in its lack of adequate evidence base, is not positively prepared in proposing that the Local Plan is capable of achieving sustainable development and is unlikely to be effective in its stated goals or its ability to deliver the required results for sustainable development over the plan. As such, it is also not consistent with the NPPF.