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Submitted to Oxford Local Plan 2045 Submission Draft (Regulation 19) Consultation
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Contact Information

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5 Organisation Name (if applicable)

Organisation:
Oxford Green Councillors

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?, 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:

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 justified

reasons for unsoundness S1:

amending policy E1 which appears to support the loss of employment floorspace to support housing delivery, but on key employment sites the loss must be fully justified, the employment use maintained and the number of jobs retained (criteria f and g). This is too inflexible and given the jobs:housing imbalance is not appropriate.

E1f) indicates that the employment use should be maintained. This is inflexible, inappropriate and should be deleted

Delete S1e which indicates that housing is only a priority away from current employment sites

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:

Policy S3: Infrastructure Delivery in New Development

20 Do you consider that policy S3 is sound?

Not Answered

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.

s3 comments:

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:

Chapter 1: Vision and Strategy (whole chapter)

28 Do you wish to comment on any other part(s) of Chapter 1? Please state the relevant section or paragraph reference(s):

references for further comment chap 1:

Overarching threads, reducing inequality, addressing climate change, enabling a liveable city,

29 Do you consider that the parts of Chapter 1 mentioned above are sound?

No

30 If you do NOT consider the parts of chapter 1 mentioned above 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

31 Do you consider that Chapter 1 is legally compliant? If you do NOT consider the chapter 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

chapter 1 legal compliance:

The plan does not deliver on the overarching threads. The overall strategy of meeting all identified employment needs arising within the city while exporting its unmet housing needs to greenfield sites in neighbouring districts does not meet the aims of the overarching threads.

Reducing inequality - the plan includes a great deal more employment space than housing. Drastically increasing the number of jobs in the city will increase the demand for housing and drive up the cost of housing. Higher housing costs in Oxford will increase inequality.

Addressing climate change - The jobs:housing imbalance will encourage car use, worsen traffic congestion, road safety and pollution.

Enabling a liveable city - It will not be possible for most of the employees on the new employment sites to live within a 15 min walk of their workplace. The strategy is not consistent with NPPF, para 111 a) as it fails to support an appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

The plan is not consistent with NPPF, para 8 on sustainable development, which seeks a range of homes to meet the needs of present and future generations.

32 Please set out what change(s) you consider necessary to make the stated part(s) of the chapter 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 c1 sound:

The ratio of the number of jobs created to the number of homes provided must be reduced.

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 justified

h1 comments:

1. Increasing the % of affordable housing

Oxford's housing crisis demands more affordable housing and currently we're working with a policy that requires developers to meet 50% affordable housing. The need for affordable housing has not reduced since the last local plan, it has increased. For this reason, the alternative that should have been considered in this plan is one that studies the viability of reducing the assumed profit margin made by developers, in order to increase the proportion of affordable housing in the city.

Policy H1 of the local plan sets out a plan to build an average of 463 houses per annum over the planned period of 2025-45. However, the council's housing needs assessment projects that, per annum, the projected need of households both unable to afford to buy or rent will be 656.

The viability assessment that underpins these housing targets assumes developers require a 20% profit margin. However, government guidance on viability in plan making suggests that assuming a 15-20% profit margin is suitable [1]. It further states that a lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where it guarantees an end sale at a known value and reduces risk.

Protecting the profit margins of developers should not be prioritised over maximising targets for building affordable homes in Oxford, nor should expectations over necessary profit margins be overinflated.

According to UKHPI statistics, in October 2025, the average house price was £269,862, while in Oxford, it was £504,820 [2]. Given Oxford's extremely high average house prices, it is justified to assume that developers will still build in Oxford if the rate of profit margin was closer to 15% than 20%.

Across the UK, 2024 was a "bumper year for new builds", where the price of a new build rose by 28.8%, compared to minor increases to materials and labour, increasing only by 1.3% and 4.8% respectively [3]. At the same time, the UK's largest developers consistently report "supernormal profits" delivering similar profit levels to some of the world's largest oil companies [4].

[1] - <https://www.gov.uk/guidance/viability>

[2] - [https://landregistry.data.gov.uk/app/ukhpi/compare?in=avg&location\[\]=K02000001&location\[\]=E07000178&st=all&lang=en](https://landregistry.data.gov.uk/app/ukhpi/compare?in=avg&location[]=K02000001&location[]=E07000178&st=all&lang=en)

[3] <https://www.westoneloans.co.uk/blog/new-builds-decoupled-from-materials-and-labour>

[4] <https://housingevidence.ac.uk/wp-content/uploads/2024/01/CaCHE-housebuilding-report-v9-25.09.pdf>

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:

The Local Plan should assume a 15% gross development value, rather than 20%. This alteration should allow for an increase in targets for building affordable homes.

See reasoning for proposal in question 34.

Policy H2: Delivering Affordable Homes

37 Do you consider that policy H2 is sound?

No

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.

policy is NOT justified

h2 soundness comments:

3,300 households are currently on the housing waiting list in Oxford. Social housing provides secure homes for those with the greatest need for genuinely affordable housing, unable to pay the cost of market rents in the city. Bringing down this waitlist should be prioritised over providing more opportunities for people hoping to get on the housing ladder. We believe that an appropriate alternative, given the evidenced need, should be to increase the proportion of new housing for social rent to the absolute possible maximum.

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:

In policy H2, replace "at least 80%" (of affordable units on the site should be provided as onsite social rented dwellings) to "90%". See discussion in question 38 for why this would make the plan sound.

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 justified

E1 comments:

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:

Policy E1 appears to support the loss of employment floorspace to support housing delivery, but on key employment sites the loss must be fully justified, the employment use maintained and the number of jobs retained (criteria f and g). This is too inflexible and given the jobs:housing imbalance is not appropriate similarly, for other (i.e. non key) employment sites, E1f) indicates that the employment use should be maintained. This is inflexible, inappropriate and should be deleted.

Policy E3: Community Employment and Procurement Plans

102 Do you consider that policy E3 is sound?

No

103 If you do NOT consider policy E3 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 consistent with national policy

e3 soundness comments:

The NPFF states that sustainable development means the planning system should "support strong, vibrant and healthy communities" and support inclusive growth. In the 2021 Census on deprived households, it was found that just under a third of households in Oxford experience at least 1 dimension of deprivation, and 9 local areas (LSOAs) that are in the bottom 20% for income deprivation across the country. Meanwhile, Oxford remains the least affordable UK cities for housing with average house prices over 15 times the average salary in 2022 (Centre for Cities 2023).

In this context, Oxford City Council's Corporate Strategy for 2024-28 commits to "Increase the number of people paid the Oxford Living Wage to improve the minimum standard of living". The Local Plan should therefore require developers to play an important role in ensuring that the Oxford Living Wage is not only paid to workers employed during the construction phase, but also those in the end user phase (i.e. those who go on to work on the site in available units once they have been constructed). This can be delivered through:

- Becoming an Oxford Living Wage accredited employer, and/or guaranteeing the Oxford Living Wage is paid to directly and indirectly employed workers on the site during the construction phase
- Requiring new occupants that move into the properties - if the developer remains to be the landlord of the properties - to pay their directly employed workers the Oxford Living Wage, and encourage their subcontractors to do the same

The Living Wage Foundation accredits these kinds of developments "Living Wage Zones", and would be able to support developers and the council in the process of getting these zones established, accredited and monitored. Key examples of these include the Olympic Park in East London and the Meridian Water Development in North London.

104 Do you consider that policy E3 is legally compliant? If you do NOT consider policy E3 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

e3 legal compliance comments:

105 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 e3 sound:

Add new bullet point: "Implementation of a Living Wage Zone, securing payment of the Oxford Living Wage to all directly and indirectly paid workers who work on the site following construction"

See answer to question 103 for reasoning.

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 justified

g1 comments:

Public playgrounds are vital community assets, providing a free, safe and secure environment for children to play. Following community campaigns for the protection and expansion of playgrounds across the city – from the campaign to Save Bertie Park [1] to the campaign for a playground in the city centre [2] – it is important that the City Council recognises the demand from residents. In this context and assessing this need, the Local Plan should ensure that there will be no net loss of playground space across Oxford unless this would have a significant or adverse impact upon public amenity or ecological interest, in the context of increasing pressures for development.

[1] <https://savebertie.com/>

[2] <https://www.change.org/p/establish-a-children-s-playground-in-oxford-city-centre>

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:

In Policy G1, insert after “Planning permission will not be granted for development that results in the loss of “, “playground space or”, so that it reads: “Planning permission will not be granted for development that results in the loss of playground space or other green infrastructure features such as hedges or ponds where this would have a significant adverse impact upon public amenity or ecological interest.

See reasons in question 120.

Policy G4: Delivering mandatory net gains in biodiversity

131 Do you consider that policy G4 is sound?

No

132 If you do NOT consider policy G4 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

g4 comments:

When the “State of Nature” report came out in September 2023 by Natural England, it alerted the UK government to the fact that the UK was one of the most nature depleted countries in the world, with a decline of 19% in species since the 1970s. The report also promoted that the ‘Global Biodiversity Framework’ was an universal commitment of all nations to deliver “30 by 30” : the commitment to protect 30% of their land and water to nature by 2030. This policy should have been prepared with a needs assessment that recognised the following evidence base:

- The area possesses a rich and diverse ecosystem, especially for its size
- The area has experienced a greater percentage increase in built up areas compared to other local authority areas
- The loss of biodiversity has been greater than other local authority areas.
- Nature declines and deficits in the city are significant
- The city will, for a number of years, continue to experience significant development pressure
- The need to ensure BNG delivers meaningful gains to address past declines
- An increase in BNG would not adversely affect development viability or housing supply - or where they do, the costs are comparatively low compared to other policy costs
- Natural capital plays a fundamental role in the area's economic prosperity as well as its impact on the health and wellbeing of residents
- The city has lots of parks, woodlands, river, allotments, street trees, private gardens which together form a part of a wider network of green and blue infrastructure, and therefore there is opportunity to protect and enhance them as well as develop opportunities for creating more joined up corridors across the city
- Local residents have called for greater access to nature, particularly after the pandemic
- In 2019, Oxford City Council declared a climate emergency where its Citizens Assembly on Climate Change raised that enhanced biodiversity was central to the overall net zero vision

In order for Oxford to play its role in this commitment to a Global Biodiversity Framework - we should be aiming higher than simply above 10%, the national minimum requirement. Other councils are considering and implementing this, including Bath & North East Somerset (15%), Kent (20%) and Coventry (20%).

133 Do you consider that policy G4 is legally compliant? If you do NOT consider policy G4 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

g4 legal compliance:

134 Please set out 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 (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 g4 sound:

In policy G4, replace "exceeds 10%" with "has a minimum 20%".

See reasons in question 132.

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

270 Do you consider that Policy C6 is sound?

No

271 If you do NOT consider policy C6 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

c6 comments:

the policy on transport assessments (C6) should be made more robust as follows - at the end of the first sentence add 'as soon as possible as the development proceeds and measures have been taken to ensure the need to travel by car is minimised' - the references to pedestrian and cycle movements and public transport should be higher up the list of factors to be considered - they should be a) and b) not c) and d) - in existing d) after 'access to high quality public transport is facilitated' add 'and, where appropriate, funded for a specified period'

272 Do you consider that Policy C6 is legally compliant? If you do NOT consider policy C6 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

c6 legal compliance comments:

273 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 c6 sound:

Policy C8: Motor Vehicle Parking Design Standards

278 Do you consider that Policy C8 is sound?

Not Answered

279 If you do NOT consider policy C8 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.

c8 comments:

the policy should also refer to the provision and maintenance of car clubs
the policy on motor vehicle parking design standards (C8) should encourage low traffic neighbourhoods and car-free developments (as well as low car developments). The council should be proactive and identify sites for car-free

development

280 Do you consider that Policy C8 is legally compliant? If you do NOT consider policy C8 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

c8 legal compliance comments:

281 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 c8 sound:

Policy SPS6: Former Iffley Mead Playing Field

347 Do you consider that Policy SPS6 is sound?

No

348 If you do NOT consider policy SPS6 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

sps6 comments:

A number of clubs have highlighted the need for the city to update its pitch strategy given the very high need for pitch space across the city. This site allocation removes a playing field that could help to serve this need for pitch space. The entire site should therefore not be allocated for housing.

349 Do you consider that Policy SPS6 is legally compliant? If you do NOT consider policy SPS6 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

sps6 legal compliance comments:

350 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 sps6 sound:

Reconsider whether the entire site should be reallocated based on an updated needs assessment of the pitch strategy.

Policy WEAOF: West End and Botley Area of Focus

495 Do you consider that Policy WEAOF is sound?

Not Answered

496 If you do NOT consider policy WEAOF 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.

weaof comments:

497 Do you consider that Policy WEAOF is legally compliant? If you do NOT consider policy WEAOF 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

weaof legal compliance comments:

498 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 WEAOF sound: