

Oxford Local Plan 2045 Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name:

John Cole

Organisation (if applicable):

Address:

Email:

Date:

23 February 2026

Data protection:

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2040 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2040 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

☒ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.

☐ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

Do you wish to speak at the examination hearings?

(Please note that the Inspector will decide who to invite to speak)

Yes ☒ No ☒

Do you wish to be notified when:

the Council submit the Oxford Local Plan 2045 to the Government?

☒ ☐

the Inspector's Report is published?

☒ ☐

the Oxford Local Plan 2045 is adopted by the Council?

☒ ☐

GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team

Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team

T: 01865 252847

planningpolicy@oxford.gov.uk

www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**

Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	SPE13	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?

☐ Yes

☐ No

(b) is sound?

☐ Yes

☒ No

☐

☐

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?

☐

(c) effective?

☐

(b) justified?

☒

(d) consistent with national policy?

☐

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

The concept of including potential development on the Ruskin Field site is not justified because:

1 the possible access to the site from Foxwell Drive is not included in the plan of the site but I have been made aware that an option agreement has been entered into between the College and Oxford City Council under which the Council will substantially benefit if development is allowed. I hope this conflict of interest will be brought to the attention of the inspector

2 the site would generate substantially increased traffic in the Old Headington Conservation Area, particularly if the further development of Ruskin Campus is allowed. The Ruskin Field site requires a minimum of 30 dwellings which, when added to the minimum number of dwellings

Please use an extra sheet if completing a paper copy.

SPE13

Q4.

The concept of including potential development on the Ruskin Field site is not justified because:

1 the possible access to the site from Foxwell Drive is not included in the plan of the site but I have been made aware that an option agreement has been entered into between the College and Oxford City Council under which the Council will substantially benefit if development is allowed. I hope this conflict of interest will be brought to the attention of the inspector

2 the site would generate substantially increased traffic in the Old Headington Conservation Area, particularly if the further development of Ruskin Campus is allowed. The Ruskin Field site requires a minimum of 30 dwellings which, when added to the minimum number of dwellings suggested in the Plan on the Ruskin Campus site, would create additional traffic on the only roads leading out of Old Headington, ie St Andrew's Road, Copse Lane and Ambleside Drive. Those roads are already suffering from very high traffic use

3 the site is environmentally very sensitive, as acknowledged in the Plan, and any development would represent a considerable threat to wildlife, water courses and vegetation.

Development of this site is, for so many reasons, including those above, unrealistic and very damaging to the Conservation Area. Given the number of other sites in Oxford included in the Plan, the inclusion of this very important site in the Plan is unjustified

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Removal of this site from the Plan

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Notes on responding to the Regulation 19 Consultation

We have published the Oxford Local Plan 2045 Proposed Submission Draft for consultation before we submit it for examination¹ by an independent Planning Inspector. Any comments received will be considered by the City Council and the Inspector.

In these notes we explain the criteria that the inspector will use and that you should also use when commenting on the plan.

The planning inspector will consider whether the document:

- complies with the **LEGAL REQUIREMENTS**; and
- is **SOUND**.

DUTY TO CO-OPERATE

The Inspector will check that the Proposed Submission Draft meets the duty to co-operate as set out in the Act². The Act states that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

LEGAL REQUIREMENTS

To comply with the legal requirements, the Proposed Submission Draft must:

- be identified in the Local Development Scheme³;
- have involved the community as set out in the Council's Statement of Community Involvement⁴;
- be published in line with the procedure for publishing a policy document, as set out in the regulations⁵;
- have involved the production of a Sustainability Appraisal Report⁶.

SOUND

To be sound⁷ the Proposed Submission Draft must be:

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

GENERAL ADVICE

If you are seeking a change to the document, please check that you have:

- made it clear in what way the document is unsound in regard to the legal requirements and tests of soundness set out above;
- stated precisely how you think the document should be changed;
- supported your comment with evidence showing why the document should be changed; and
- provided all the evidence and supporting information necessary to support or justify your comment and the suggested change, as there will not normally be a later opportunity to comment further.

If you are part of a group who share a common view on how the document should be changed, it would be very helpful for that group to send a single response that represents the view, rather than for many individuals to send in separate comments that repeat the same points. In such cases the group should state how many people it represents and how it has been authorised to do so.

Further detailed guidance on the preparation, publication and examination of DPDs is provided in in the National Planning Policy Framework and National Planning Policy Guidance.

Useful links

[National Planning Policy Framework](#): (particularly section on Plan Making: paragraphs 35 - 37)

[The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)

[The Planning and Compulsory Purchase Act 2004](#)

[Local Development Scheme](#);

[Statement of Community Involvement](#)

If you would like further advice, please contact the Planning Policy team at:
planningpolicy@oxford.gov.uk; 01865 252847

¹ In accordance with the Planning and Compulsory Purchase Act 2004 (as amended).

² As set out at Section 20(5)(c) and Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended)

³ A programme of work, setting out the documents the Council proposes to produce.

⁴ A document that sets out a strategy for involving the community in preparing policy documents.

⁵ This includes publication of appropriate supporting documents by making them available at the Council's offices at St Aldate's Chambers and publication on the Council's website. In addition the Council must notify particular organisations and any persons who have requested to be notified

⁶ A tool for appraising policies to ensure they reflect social, environmental and economic factors.

⁷ Soundness is explained fully in the NPPF at paragraph 35