

Dominic Woodfield
13 March 2026 13:58
Planning Policy

I have just submitted my Reg 19 response to the Local Plan via your on-line form/portal.

Best regards



Submitted to Oxford Local Plan 2045 Submission Draft (Regulation 19) Consultation
Submitted on 2026-03-13 13:40:08

Contact Information

1 Name

Name:
Dominic Woodfield

2 Email Address

Email:
[REDACTED]

3 Postal Address

postal address:
[REDACTED]

4 Postcode

postcode:
[REDACTED]

5 Organisation Name (if applicable)

Organisation:
N/a

6 In what capacity are you responding to this consultation?

Individual/Member of the public

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?:
N/a

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:

If allocation SP58 is not deleted, I will wish to make representations to the examination (both written and oral) on that issue. To the extent that wider issues around policy protection for ecologically important sites are engaged, I may also wish to make representations on these, inc on HRA matters

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:

There is a clear conflict between S1(g) and S1(h) and the direction of the draft LP, exemplified by the continued inclusion of SPS8 as a housing allocation. The Council now has incontrovertible evidence that the LP2036 allocation of that site was a product of procedural and consultation flaws and that the site is not a suitable (i.e. capable of being policy compliant) development site. The Council seems determined to retain it as an allocation not for reasons of site suitability/sustainability, but more to do with obduracy and sunk costs.

Clauses (i) and (j) are also rendered unsound in that as drafted they allow for decision-making to be made in a vacuum. Without a clause requiring development applicants to submit adequate supporting information to allow the relevant material considerations to be identified and weighed into the decision-making process, these clauses and the presumption in favour that they enshrine, bake in real cope for poor and unsustainable decision making where there is a policy vacuum

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.

No

S1 legal compliance comments:

See above. The SA justification for continuing to include SPS8 is not positively prepared or justified. The retention of this allocation undermines the soundness and by extension lawfulness of the entire plan.

Clauses (i) and (j) need to be amended to allow for evidence based decision-making, not sole reliance on an evidence vacuum and policy presumption

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:

Delete Policy SPS8. This will have no measurable effect on the soundness of the Plan as the policy has no minimum housing delivery requirement (i.e. it is effectively an allocation of zero)

Clauses (i) and (j) need to be amended to allow for evidence based decision-making, not sole reliance on an evidence vacuum and policy presumption

Policy S2: High Quality Design

16 Do you consider that policy S2 is sound?

No

17 If you do NOT consider policy S2 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, policy is NOT consistent with national policy

s2 comments:

See comments made in respect of S1. The SPS8 allocation is an example of the Council seeking to deviate from this policy before it is even adopted. The SPS8 site cannot be delivered without harm to the Iffley Conservation Area. It should be deleted

18 Do you consider that policy S2 is legally compliant? If you do NOT consider policy S2 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

s2 legal compliance comments:

See above

19 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 s2 sound:

Delete Policy SPS8 to avoid internal plan conflict with S2

Policy S4: Plan Viability

24 Do you consider that policy S4 is sound?

No

25 If you do NOT consider policy S4 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

s4 comments:

SPS8 is an example of a site that is not viable to develop without offending sustainability and heritage policies. It should be deleted

26 Do you consider that policy S4 is legally compliant? If you do NOT consider policy S4 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

s4 legal compliance comments:

See above

27 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 s4 sound:

Delete Policy SPS8

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:

Where we are

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:

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 Plan needs to recognise that there are spatial and wellbeing limitations to growth, and that striving for investment and growth in tech and science labs as a 'trickle down' panacea for the City's challenges and ills will end up harming the environmental and heritage characteristics that actually make Oxford an attractive place to live, work and invest. There are reasons why Luton or Swindon do not punch at the same weight as Oxford, and they are not solely due to the University/s and the academic melting pot here. If the Plan does not re-balance and prioritise housing the City's residents and meeting its basic service and well-being requirements over bending over backwards for the University and Science/Tech sectors, the thin thread holding these two parts of the City together will break to the impoverishment and economic detriment of all.

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:

See my answers on Chapter 1

Policy H3: Affordable housing contributions from other development types

41 Do you consider that policy H3 is sound?

Not Answered

42 If you do NOT consider policy H3 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.

h3 comments:

43 Do you consider that policy H3 is legally compliant? If you do NOT consider policy H3 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

h3 legal compliance:

44 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 h3 sound:

See my answer on Chapter 1. I think the Plan should be firmer on prioritising housing generally and affordable housing specifically over new student accommodation

Policy H8: Location of new student accommodation

61 Do you consider that policy H8 is sound?

Not Answered

62 If you do NOT consider policy H8 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.

h8 comments:

63 Do you consider that policy H8 is legally compliant? If you do NOT consider policy H8 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

h8 legal compliance comments:

64 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 h8 sound:

Nort clear what is meant by "An existing university or college campus or academic site". If this includes land owned or controlled by an academic institution then I would contend that the policy is ineffective and therefore not sound

Chapter 2: A Healthy Inclusive City to live in (whole chapter)

89 Do you wish to comment on any other part(s) of Chapter 2? Please state the relevant section or paragraph reference(s):

references for further comment chap 1:

general

90 Do you consider that the parts of chapter 2 mentioned above are sound?

Not Answered

91 If you do NOT consider the parts of chapter 2 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.

c2 comments:

92 Do you consider the parts of chapter 2 mentioned above are legally compliant? If you do NOT consider them 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 chapter please also use this box to set out your comments.

Not Answered

c3 legal compliance comments:

93 Please set out, as precisely as possible, 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 chapter 2 sound:

See my comments on Chapter 1

Chapter 3: A Prosperous City with a global important role in learning, knowledge and innovation (whole chapter)

114 Do you wish to comment on any other part(s) of Chapter 3? Please state the relevant section or paragraph reference(s):

references for further comment chap 1:

General comment

115 Do you consider that the parts of chapter 3 mentioned above are sound?

Not Answered

116 If you do NOT consider the parts of chapter 3 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.

c3 soundness comments:

117 Do you consider the parts of chapter 3 mentioned above are legally compliant? If you do NOT consider them 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 chapter please also use this box to set out your comments.

Not Answered

chapter 3 legal compliance comments:

118 Please set out, as precisely as possible, 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 chapter 3 sound:

See my comment on Chapter 1

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 effective, policy is NOT consistent with national policy

g1 comments:

Site allocation SPS8 should be deleted and the site allocated as part of the GI network. The Council's decision making over this site in this LP process has been made in full cognisance of its undisputed value as a City Wildlife Site and the suggestion that it is of lesser value because that designation has not (yet) been attributed to it is nonsensical and tantamount to saying something has no value because no-one has put a price tag on it.

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.

No

g1 legal compliance comments:

See above. The GI is incomplete

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:

Delete SPS8 and allocate the site as part of the City's GI

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

123 Do you consider that policy G2 is sound?

Not Answered

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.

g2 comments:

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:

Spelling mistake in policy wording "An ecological buffer zone of at least 10 metres with should be retained, or if it is not already in place it should be reinstated where possible" should refer to 'width'

Compensatory recreational open space provision should be no smaller in area, and larger where possible, that what is lost

Policy G3: Provision of new Green and Blue features - Urban Greening Factor

127 Do you consider that policy G3 is sound?

Not Answered

128 If you do NOT consider policy G3 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.

g3 comments:

129 Do you consider that policy G3 is legally compliant? If you do NOT consider policy G3 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

g3 legal compliance comments:

130 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 g3 sound:

Policy G4: Delivering mandatory net gains in biodiversity

131 Do you consider that policy G4 is sound?

Not Answered

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.

g4 comments:

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:

The Policy (and its objectives) would be strengthened by making reference to validation requirements more clear. The Policy states that "A completed Statutory Biodiversity Metric spreadsheet must be submitted in support of planning applications. All metrics must be completed in line with the

requirements set out in the relevant Statutory User Guide, Technical Supplement, Legislation, and best practice principles." which is welcomed, but it would be clearer if this was stated to be a requirement for validation.

Policy G5: Delivering Onsite Ecological Enhancements

135 Do you consider that policy G5 is sound?

Not Answered

136 If you do NOT consider policy G5 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.

g5 comments:

137 Do you consider that policy G5 is legally compliant? If you do NOT consider policy G5 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

g5 legal compliance comments:

138 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 g5 sound:

The policy is somewhat misleading in that it refers to generic ecological enhancements but the three pots actually only cater for benefits to a limited number of commensal species

Policy G6: Protecting Oxford's biodiversity including the ecological network

139 Do you consider that policy G6 is sound?

No

140 If you do NOT consider policy G6 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, policy is NOT consistent with national policy

g6 comments:

Site allocation SPS8 conflicts with this policy and should be deleted.

The Plan HRA continues to fail to adequately assess (or address) the recreational pressure increase on Port Meadow SAC and their implications for optimum site management and the maintenance of condition. Similar comments can be made about other important and sensitive sites within the City (Marston Meadows SSSI, Iffley Meadows SSSI etc). While the latter fall outwith the HRA regime, due assessment of impacts upon them falls within the Council's duties as a S28G authority

141 Do you consider that policy G6 is legally compliant? If you do NOT consider policy G6 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

g6 legal compliance comments:

See above

142 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 g6 sound:

Delete Policy SPS8 and rezone as OCWS and GI

Improve scope and thoroughness of HRA, including considering means to better protect sensitive sites from population growth, recreational impact and constraints on optimum management

Policy G7: Flood risk and Flood Risk Assessments (FRAs)

143 Do you consider that policy G7 is sound?

Not Answered

144 If you do NOT consider policy G7 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.

g7 comments:

145 Do you consider that policy G7 is legally compliant? If you do NOT consider policy G7 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

g7 legal compliance comments:

146 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 g7 sound:

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.

g8 comments:

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:

Suggest 'where feasible' deleted from the opening para.

The remainder of the policy outlines in clear terms where exceptions would be considered, so it is not needed. Introducing 'where feasible' in the opening para will encourage development applicants on constrained sites toward trying to provide evidence of non-feasibility rather than why their development should be granted an exception.

Chapter 4: A Green Biodiverse City that is resilient to climate change (whole chapter)

155 Do you wish to comment on any other part(s) of Chapter 4? Please state the relevant section or paragraph reference(s):

references for further comment chap 4:

General comment

156 Do you consider that the parts of chapter 4 mentioned above are sound?

No

157 If you do NOT consider the parts of chapter 4 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 positively prepared, policy is NOT justified, policy is NOT effective, policy is NOT consistent with national policy

c4 comments:

Site allocation SPS8 is inconsistent with the thrust of this chapter and the policies within it - it should be deleted and the land rezoned as a OCWS and as part of the GI network

158 Do you consider the parts of chapter 4 mentioned above are legally compliant? If you do NOT consider them 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 chapter please also use this box to set out your comments.

Not Answered

c4 legal compliance comments:

See above

159 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. Please be as precise as possible.

suggested changes to make chapter sound:

See above

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 effective, policy is NOT consistent with national policy

r5 comments:

There is no substantive discussion of local sewage infrastructure capacity which is known to be exceeded and be leading to significant pollution of the Thames. The planning system has a role to play in controlling such pollution by not sanctioning development which exacerbates the existing problem. There either needs to be a moratorium on new development that adds to sewage processing demand (or can justify why it will not - for example via retrofitting and betterment of the existing situation, or because new occupants can be expected to be from within the same sewage treatment catchment) or new development needs to actively contribute towards defined and timetabled sewage upgrades via ring-fenced developer contributions

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:

See above

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:

See above

Policy R7: Land Contamination

184 Do you consider that policy R7 is sound?

No

185 If you do NOT consider policy R7 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

r7 comments:

The nature of any land contamination and an evidence-based means to address it should be established at application stage, not required as a site investigation and remediation plan condition

186 Do you consider that policy R7 is legally compliant? If you do NOT consider policy R7 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

r7 legal compliance comments:

See above

187 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 r7 sound:

See above

Policy R8: Amenity Impacts of Development

188 Do you consider that policy R8 is sound?

Not Answered

189 If you do NOT consider policy R8 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.

r8 comments:

190 Do you consider that policy R8 is legally compliant? If you do NOT consider policy R8 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

r8 legal compliance:

191 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 r8 sound:

Chapter 5: A City that utilises its resources with care, protects the air, water and soil and aims for net zero carbon Vision and Strategy (whole chapter)

192 Do you wish to comment on any other part(s) of Chapter 5? Please state the relevant section or paragraph reference(s):

references for further comment chap 5:

General

193 Do you consider that the parts of chapter 5 mentioned above are sound?

No

194 If you do NOT consider the parts of chapter 5 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 positively prepared, policy is NOT justified, policy is NOT effective, policy is NOT consistent with national policy

c5 comments:

See comments on individual policies

195 Do you consider the parts of chapter 5 mentioned above are legally compliant? If you do NOT consider them 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 chapter please also use this box to set out your comments.

No

c5 legal compliance comments:

See above

196 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 chapter 5 sound:

See above

Policy HD2: Making Efficient Use of Land

201 Do you consider that policy HD2 is sound?

No

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.

policy is NOT positively prepared, policy is NOT effective, policy is NOT consistent with national policy

hd1 comments:

The overall objective of making best use of suitable land, including via appropriate densification, is supported but this policy takes a blanket approach which renders it unsound. See below.

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.

No

hd2 legal compliance comments:

See below

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 states " It is expected that sites across the city will generally be capable of accommodating development at an increased scale and density to their surroundings." . It is unclear what precisely is meant by this statement and/or what the evidence is for it. If 'surroundings' means outside the City limits, then that ought to be made clear. Otherwise there is a risk of the policy being misinterpreted to suggested that densification is appropriate in all circumstances. There will be situations where it is not.

The list a-f of requirements suggests that the Plan envisages densification will be appropriate in all circumstances. That is a flawed assumption and one that is posited here without any supporting evidence. There is a high degree of tension between "maximising density" and in "protecting and enhancing green infrastructure" (just one example). The scope for densification will vary from site to site but a blanket approach, as here, is unsound and creates a high likelihood of irreconcilable policy conflicts arising.

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 positively prepared, policy is NOT justified, policy is NOT effective, policy is NOT consistent with national policy

hd3 comments:

The Policy cannot be effectively implemented as it conflicts with SPS8. SPS8 should be deleted

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.

No

hd3 legal compliance comments:

See above

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:

Delete SPS8

Chapter 7: A more equal and inclusive city with strong communities and opportunities for all (whole chapter)

282 Do you wish to comment on any other part(s) of Chapter 7? Please state the relevant section or paragraph reference(s):

references for further comment chap 7:

Quiet Routes are a good concept which appears to have been removed from the LP

283 Do you consider that Chapter 7 is sound?

No

284 If you do NOT consider the parts of the chapter 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 positively prepared

c7 comments:

285 Do you consider that Chapter 7 is legally compliant? If you do NOT consider chapter 7 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

c7 comments:

286 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. Please be as precise as possible.

suggested changes to make c7 sound:

The designation and protection of principal Quiet Routes should be enshrined into LP policy

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 positively prepared, policy is NOT effective

sps6 comments:

The policy suffers from potentially irreconcilable tensions between its objectives. It may not be possible to deliver "a minimum number of dwellings of 84" and meet the other requirements of the Policy, such as a meaningful amount of public open space. It remains unclear whether adequate SuDS provision is deliverable (especially with that number of dwellings) given high water table and potential for ground water flooding.

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

No

sps6 legal compliance comments:

See above

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:

See above. There should be no minimum number of units placed on the policy in the absence of evidence that 84 is achievable at the same time as delivering the other stated objectives. There is no minimum affordable requirement set out, which should be remedied

Policy SPS7: Kassam Stadium

351 Do you consider that Policy SPS7 is sound?

Not Answered

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.

sps7 comments:

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:

It is unfortunate that the City Council has allowed and perhaps even encouraged the allocation of this site, which has galvanised the owner's negotiating position that it is worth more for housing, and forced the Club into having to relocate. This will entail the demolition of a perfectly usable and established stadium and the construction of a new one on a greenfield site. This is not a victory for sustainable or sensible land-use planning. It also takes the club stadium away from the epicentre of its fanbase, which will further denude the sustainability credentials of the new ground (and especially so in advance of any rail link being re-opened). The Policy is also weak on the requirements for the Minchery Farmhouse, which should not be considered as a severable and separate entity but part of the whole shambles that successive Councils' inability to control Kassam has delivered in that area. The opportunity to change course may now have passed, but the Council has to take part of the blame for a sorry legacy

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, policy is NOT consistent with national policy

sps8 comments:

This site was proposed for allocation in LP2036 on the basis of scant evidence, meaning that assessment conclusions around suitability were reached that have been demonstrably proven to be incorrect since. The subsequent allocation of the site in the adopted LP2036 does not provide any justification for failing to remedy those mistakes now. The SA produced for this site this time round shows it to score very badly even by the Council's own flawed and prejudicial scoring. There are no excuses for persisting with an allocation for what would be an unsustainable and environmentally (and heritage) damaging development at any scale. The inclusion of this site allocation offends many other emerging policies, and those internal conflicts render the Plan as a whole unsound. Deletion of this site would have no consequence for housing targets as it has been given no lower delivery limit (=effectively zero). The Council now accepts it is of at least City Wildlife Site status and that's what it should be designated and zoned as if the Council is not to depart from its own policies and objectives in the Plan

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

No

sps8 legal compliance comments:

See above.

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:

Delete SPS8 allocation and rezone the site as OCWS and GI

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:

All

538 Do you consider the Sustainability Appraisal to be sound?

No

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

No

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

No

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:

The sustainability appraisal has been woeful in regards to SPS8, and still retains factual errors and prejudiced assessment scorings

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:

Allocation SPS8 should be deleted