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OXFORD CITY COUNCIL

Oxford Local Plan 2045
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

139

Your name: Stephen Dawson

Organisation (if applicable): Oxford Preservation Trust

Address: [redacted]

Email:

Date: 17 March 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 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 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.

	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	◉	○
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 use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

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.

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		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 <u>not</u>: (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.

Please use an extra sheet if completing a paper copy.

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.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Oxford Preservation Trust

Planning Policy Team
Oxford City Council
Oxford Town Hall
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Oxford OX1 1BX

By email: planningpolicy@oxford.gov.uk

13 March 2026

Dear all

OXFORD CITY COUNCIL LOCAL PLAN 2040 REGULATION 19 PRE-SUBMISSION PUBLICATION CONSULTATION

Introduction

Oxford Preservation Trust (OPT) is pleased to review and provide comments on the Oxford Local Plan 2045 Regulation 19 Pre-submission Consultation.

The Trust is an independent charity, established in 1927 with the principal aim of conserving and enhancing Oxford and its setting. We take a forward-thinking and positive approach to development, looking to influence change rather than stopping it, preserving the best of the old and encouraging the best of the new. We are committed to ensuring that Oxford can continue to flourish and prosper, whilst protecting its historic character and setting.

We own and look after almost 1,000 acres of land in and around Oxford, making green space available for local people to enjoy. Protecting and enhancing green spaces within and around the city is one of our top priorities.

Our charitable objects include a strong emphasis on public benefit, specifically for those who live and work in Oxford. We therefore advocate strongly for improvements to public amenities and housing provision.

The Trust has detailed knowledge and expertise built up over many years, so that it is legitimately recognised as a professional and experienced voice. We have reviewed the Local Plan and its supporting documentation and evidence, with a particular interest in the following areas:

1. Heritage;
2. Green setting;
3. Protecting views in and out of the city;
4. Improving and protecting the public realm;
5. Impacts of tourism;
6. Access to green spaces and connectivity between them;
7. Providing housing within city and district centres.

We congratulate the City Council for the considerable work undertaken, but we consider that the Plan as it currently stands has a number of flaws and fails to provide sufficient policy guidance on various issues.

[redacted]

We therefore conclude that elements of it are **unsound**. We think that these flaws are remediable and we have provided some suggestions for how this might be achieved.

We hope that the Local Plan can be a document which helps improve the lives of those who live in the city, as well as those that come to work and visit.

Objectives and Strategy
We commend the Council on ensuring that heritage and design feature strongly in the objectives of the Local Plan.

Figure 1.2 The six Local Plan 2042 themes and underlying objectives

The environment is identified as one of the six themes underpinning the Council's vision for Oxford in 2045. We agree that Oxford's environment, particularly its broader landscape setting, is a characteristic feature of the city. Oxford is situated on the floor of a valley surrounded on all sides by undisrupted green hills, creating the effect of a 'green bowl' around the city. This 'green bowl' provides the backdrop to historically significant views in and out from the city and is the reason for the protection of Oxford's view cones policy.

Figure 1.2 sets out the underlying objectives associated with each of the six themes and there is no mention of Oxford's broader landscape setting. The protection of the characteristic landscape setting of the city essential to its semi-rural identity should feature more prominently within the objectives associated with Oxford's landscape.

We recommend these objectives are amended to highlight and reflect the significance of Oxford's wider landscape setting to ensure a sound and consistent approach in relation to the wider policies within the Local Plan.

Policy S1: Spatial Strategy and Presumption in Favour of Sustainable Development
We support this policy in principle.

We would like to see this policy specify the Council's stance in favour of applications for the change of use from commercial to residential within city and district centres, referenced elsewhere within the Local Plan (Policy C2: Maintaining Vibrant Centres). Promoting development of this type would achieve a number of the aims as well as helping to meet Oxford's unmet housing need.

We would also support a policy sanctioning vacant units, both residential and commercial, within city and district centres. The repopulation of urban centres will have a significant impact on housing need, preventing the further development of Oxford's green setting.

Policy S2: High Quality Design
Whilst we support the general aims of the policy, we'd like the policy to better define 'high quality design' and, in particular, 'high quality architecture'.

In a city rich with internationally significant buildings and streetscapes, we would like the policy to articulate council's preference for high quality architecture. We support the reference to the 'significance of Oxford heritage, historic environment and heritage-led regeneration'. The supporting text, however, could include more detailed information on what this means. It should also refer to the city's wider green

setting and highlight the importance of the historic views both from looking out of the city but also looking in (as highlighted in the Assessment of the Oxford Views Cones 2015).

Policy H1: Housing Requirement
Reference should be made within the policy or its supporting text to encourage the conversion of vacant employment uses (offices, retail) into residential use where they will not compromise active street frontages within the city centre and district centres. The delivery of residential units within the city centre and district centres would bring great benefits. More life would be breathed into city streets, such as Cornmarket Street, if there was a mix of residents, workers and tourists. This could assist greatly in helping to meet Oxford's unmet housing need and helping to protect and improve the public realm.
We are pleased to see specific reference in favour of mixed-use developments within this policy.

Policy H8: Development Involving the loss of dwellings
We support this policy and the contribution it will make towards retaining the existing housing stock.

Policy E5: Tourism and Short Stay Accommodation
Tourism is a significant sector of Oxford's economy and brings its own pressures and problems. It is disappointing to see that whilst reference is made 'Accommodating significant numbers of day visitors to Oxford can be challenging…' there is no specific reference in the policy towards addressing these issues.

We'd like to see the inclusion – either in this policy or other standalone policies – of measures to:

- mitigate the impact of tourism on the city's historic core;
- better enable the accommodation of large groups within the public realm;
- manage tourist arrival and departure, including coach parking.

Chapter 4: A Green Biodiverse City that is Resilient to Climate Change
We consider it **unsound** that there is no policy relating to the Oxford Green Belt.

The protection of the Green Belt, not least for its purpose in protecting the setting of Oxford, is consistent with national policy and this should be provided at a local level too. The Green Belt not only forms part of Oxford's wider green setting but also provides protection for a number of 'green fingers' which run into the heart of city itself. The omission of a specific policy to protect this highly sensitive land is highly concerning.

We own and manage around 1,000 acres of land in and around Oxford. We care for this land on behalf of the public, maintaining it sustainably and providing free access for everyone. We ask that these areas of land, including Wolvercote Lakes, Larkins Lane Field, Marston Fields, be included within the areas identified as Green Infrastructure on the proposed policies map, due to the significant contribution they make to the city and its people, in terms of fully accessible green space.

We are pleased to see reference to fen habitats but consider that specific reference should also be made to ancient floodplain meadows and MG4 grassland within the policies in this chapter.

Policy R2: Embodied Carbon
We consider this policy to be **unsound**.

We support the general aims within Policy R2 but the Council must take a stronger position on sustainable development including embodied carbon in light of the current climate crisis.

[redacted]

While we support the requirement for developments larger than 100 dwellings to carry out Whole Life Carbon Assessment, we consider that this should apply to development at all scales. Given national targets and the sustainable development goals within this Plan, it is important to understand the embodied carbon implications of all development. This policy should explicitly set out that demolition is a last resort, especially when a building has not exceeded its expected useful life.

Policy R3: Retro-fitting Existing Buildings
We support this policy. This approach will ensure that heritage assets and historic buildings are adapted sensitively to preserve their significance.

Policy HD3: Designated Heritage Assets
We support this policy.

Policy HD4: Non-Designated Heritage Assets
We support this policy.

Policy HD5: Archaeology
We support this policy.

Policy HD6: Views and Building Heights
We worked closely with the City Council and other specialists to create the 'Assessment of the Oxford View Cones' in 2015 and we strongly support reference to this report within the policy text.

We are also pleased to see that reference is made to the wider setting of the views. This makes it clear that the 10 view cones do not provide a definitive list of all the views, and that the wider setting, or even views that do not fall within the 10 'official' view cones can also be sensitive and warrant a high level of protection.

We'd like to see a distinction made – either in this policy or its supporting text – between 'views' and historic 'setting'.

Policy C2: Maintaining Vibrant Centres
We support the reference to increased residential development, including upper floors of commercial premises in this policy (part c).

We consider that this should be echoed in some of the more general housing policies to reinforce the contribution that the provision of residential units in the city centre and district centres could make toward delivering dwellings in sustainable locations.

We support the reference to public realm (part f), with the Local Plan working alongside other strategies and policies, such as the Central Oxford Movement and Placemaking Framework (COMPF) to improve the public realm, especially within the city centre.

Policy NEOAOF: Northern Edge of Oxford Area of Focus
We support the acknowledgement that this area is adjacent to other urban extension sites in Cherwell District Council. We urge that on Areas of Focus (AOF) of this scale, the Council works proactively to ensure that there is a joined-up approach with neighbouring authorities, particularly in the provision of wider infrastructure.

[redacted]

Reference should also be made here to the close proximity of the Green Belt to this AOF and the important role it plays in providing a green gap between North Oxford and Kidlington. It should be acknowledged the Green Belt needs to be protected, to ensure that the gap is not further eroded.

Policy SPS3: Bertie Place Recreation Ground
We object to the proposed allocation of this site for housing and consider it to be **unsound**.

Whilst we are aware that the site has previously been allocated for housing, this should not come at the expense of a public playground for children and families. Other sites should be explored which does not result in the loss of a well-used community facility which has caused significant local concern.

Policy SPS8: Land at Meadow Lane
We object to the allocation of this site and consider it to be **unsound**.

We recognise that this proposed allocation relates to a previously allocated site in the Adopted Local Plan 2036. This is an opportunity to review that allocation based on the availability of additional information regarding its landscape and ecological value. This site is within the G1 Green Infrastructure Network. It is too ecologically sensitive to be developed and serves as an important part of the Green Infrastructure Network. In addition, the site has no housing number allocated to its allocation.

The site also makes a significant contribution to the wider rural setting of Iffley. The Iffley Conservation Area Appraisal (August 2009) highlights the "predominantly rural quality" of the area and identifies the site as an important area of green space. Any development on this site will erode the importance and significance of the Conservation Area and cause significant harm to the key characteristics highlighted within the Iffley Conservation Area Appraisal.

Policy SPE14: Ruskin Field
We strongly object to the allocation of Ruskin Field for housing and consider it to be **unsound**.

The development of this site would significantly harm the setting of the Old Headington Conservation Area. The Old Headington Conservation Area Appraisal document (July 2011) identifies one of the key characteristics of the Conservation Area as the 'small fields cut off from the wider countryside which provides the rural setting of the village.'

Development of this field would completely alter the character and appearance of the wider Conservation Area and would affect views towards Old Headington from the Elsfield View Cone. The importance of this view towards Old Headington as well as towards the city centre is specifically referenced in the Assessment of the Oxford Views Cones 2015. When this allocation was previously proposed in the Oxford City Local Plan 2036, the inspector concluded '…not suitable for development because it would have a substantial negative impact on the appearance, setting and character of the Old Headington Conservation Area and is also visually sensitive from the Elsfield View Cone.'

Ruskin Field contains fen valley habitats and abuts Larkins Lane Field and Dunstan Park, both ecologically rich sites and the subjects of ongoing spring fed calcareous fen (valley fen) restoration projects. The development of Ruskin Field would pose a severe threat to these rare habitats and would cause significant harm to the peat deposits contained underneath them. The adjoining fields between this site and Dunstan Park also contain evidence of these habitats. This allocation would therefore be contrary to the policies

that form part of this proposed Local Plan relating not only to heritage but also to nature, green spaces and the green and blue infrastructure network.

We are surprised that the allocation policy does not refer to the neighbouring site (SPE13: Ruskin Campus), as the cumulative effect of both site allocations should be considered together. We conclude that this site is totally unsuitable for development.

Policy WEBRAOF: West End and Botley Road Area of Focus
Development within the West End and the Botley Road needs very careful management to prevent harm to the:

- views towards the western hills from the city centre,
- views from the western hills towards the historic city centre.

These are highly sensitive locations within some of the key historic defensive views out from St George's Tower to the west and from Raleigh Park, Harcourt Hill and Boars Hill looking towards the city. The policy should specifically refer to this, to ensure that new buildings are limited to appropriate heights.

Policy SPCW11: St Thomas School & Osney Warehouse
Overall, we have no objections to the allocation of these sites. However, the former St Thomas School building should be specifically retained as a policy condition and sufficient weight needs to be given to its retention and preservation within any forthcoming policy text. Built around 1870, this is a good example of a late 19th-century school building, whilst also providing a remnant of the historical evolution of the evolution of the St Thomas's parish and those who lived there as specifically referenced within the Oxford Central (City & University) Conservation Area Appraisal.

Green Infrastructure Network

Land at Old Marston
We strongly object to the downgrading of the Marston Gap sites from Core to Supporting within the Green Infrastructure Network and consider this **unsound**.

These sites within the Oxford Green Belt prevent the merging of Marston and Summertown. The gap forms a critical buffer that preserves Old Marston's distinct rural character. It preserves the 'village within a city' character of Old Marston village, preventing it being enveloped by development. It also plays a strategic role in maintaining the openness of one of Oxford's 'green lungs' - the fingers of protected green space reaching in towards the city centre. The meadows consist of floodplain habitats rich in biodiversity and of high landscape and ecological value. Both the Old Marston Conservation Area Appraisal (March 2016) and the 2002 Report 'A Character Assessment of Oxford in its Landscape Setting (Land Use Consultants) highlight the meadows high landscape quality and significance in preserving the green setting on the village and Conservation Area. Development of any kind on this land would be significantly harmful in regard to landscape, heritage and ecology.

Barton Triangle and Larkins Lane Field
We strongly object to the exclusion of Larkins Lane Field and the Barton Triangle from the Green Infrastructure Network and consider this **unsound**.

[redacted]

Larkins Lane has a high ecology value and is the subject of an ongoing valley fen restoration project. Barton Triangle is an open green space. Both are visually important elements in the setting of Old Headington Conservation Area.

Duty to Cooperate
There are important strategic matters, for which there is no evidence of a shared approach between the local authorities in Oxfordshire. The most pressing of these is housing need.

On some more detailed matters – including the conservation and enhancement of important views of the city, the City Council has missed opportunities to work effectively with its neighbours, such as with the Vale of White Horse and South Oxfordshire District Councils.

We ask that the Inspector be satisfied that these matters have been effectively considered by all parties within the city and county. In particular, we ask that there is an agreed joint strategy to meet the City and County's housing needs, including the critically important requirement for affordable key worker housing.

Conclusion
We confirm that Oxford Preservation Trust wishes to take part in the oral part of the Local Plan examination. This is to be able to impart to the Inspector specific and relevant knowledge about Oxford city and its heritage significance, and also to answer questions that the Inspector might have.

We trust our comments are useful to the City Council and look forward to being kept informed on the progress of the Local Plan.

Yours Faithfully,

[redacted]

Anna Eavis
Chief Executive

[redacted]