

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:
Oxfordshire Doughnut Economics Collaboration

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:

ODEC's review of LP 2045 Sustainability Appraisal shows it is unsound in failing to reflect the true impacts of the plan or provide effective monitoring. This prevents a resilient balance between social, environmental and economic sustainability from being achieved, as legally required by the NPPF.

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:

The entire document.

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?

Don't Know/Not Applicable

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:

Please see the ODEC document emailed to planningpolicy@oxford.gov.uk with an analysis of why the Sustainability Appraisal is unsound and not legally compliant.

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:

Please see the ODEC document emailed to planningpolicy@oxford.gov.uk, which sets out solutions for each topic of the sustainability appraisal as well as solutions to the general approach that would render the SA compliant and sound.

NIXON Rachel

From: Oxfordshire Doughnut [REDACTED]
Sent: 13 March 2026 15:30
To: Planning Policy
Subject: Reg 19 response from Oxfordshire Doughnut Economics Collaboration
Attachments: Oxfordshire_Doughnut_Economics_Collaboration_Reg_19
_Consultation_response_to_Oxford_Local Plan 2045_.docx.pdf

[REDACTED]

[REDACTED]

Dear Planning Policy

Please find the attached PDF giving the Reg 19 response from Oxfordshire Doughnut Economics Collaboration (ODEC).

This document is in addition to the basic details (contact details, permissions and request to speak at the examination in public) submitted by ODEC via the online consultation portal. Unfortunately the portal does not allow for documents to be attached, hence the need to send this to you separately.

Please can you confirm receipt.

Thank you

Deborah Glass Woodin
On behalf of the Oxfordshire Doughnut Economics Collaboration



Response to Reg 19 Consultation on Oxford 2045 Local Plan

by the Oxfordshire Doughnut Economics Collaboration
March 2026

The 2045 Local Plan has a vision to promote research and development in Oxford which prioritizes the interests of business and landowners. The impacts of this economic growth agenda on social and environmental sustainability both locally and globally render the 2045 Local Plan unsustainable, compromising the needs of current and future generations at a time of worsening societal crises and earth systems collapse.

We have set out below a general overview of why the Local Plan is not sound or sustainable, including solutions to these issues. This is followed by an analysis of each of the 12 SA/SEA topic areas, outlining the critical negative impacts that the Local Plan 2045 would generate on environmental and societal sustainability and how this relates to the information and claims set out in the Sustainability Appraisal.

A separate table (Appendix 1) shows Oxford City Council's assessment of LP 2045 impacts on 6 of the SA topics compared with the current situation and no plan in place. ODEC thinks that the LP 2045 impacts have been significantly underestimated and have included a new rating for the likely true impact of LP 2045.

Local Plan 2045 and the Sustainability Appraisal

General issues

The Local Plan policies that influence sustainability and their assessment in the SA/SEA are not sound, as they are:

- not objectively assessed and lack data, meaningful indicators and specific targets to support the claims of sustainability in the SA/SEA assessment
- not justified in considering reasonable alternatives that support a better balance between economic, social and environmental sustainability
- not effective due to lack of policies or sufficient joint working to deliver the claims of sustainability
- not consistent with sustainable development
- Inconsistent with meeting the UK's legal requirement to reach UK net zero requirement by 2050 or Oxford's net zero aim by 2040.

General solutions

The plan should be reviewed to make the social and environmental aims of the Plan's vision to be central requirements of all the Local Plan 2045 policies, rather than aspirations that can be swept aside to prioritise 'development'.

The 2045 Local Plan should then be comprehensively rewritten with the aim of meeting everyone's needs within the limits of the planet, in a way that is redistributive and regenerative. The revised plan must take an Oxfordshire-wide view, as the impacts of development would be far reaching and not confined to the city. This was the rationale for

the abandoned 2050 Oxfordshire Plan, which should be revisited in the context of a multifunctional land use framework and the spatial strategies now starting to come forward.

Oxfordshire has a wealth of expertise and knowledge across all sectors, which should be harnessed to provide:

- relevant baseline data
- relevant key indicators and appropriate targets to cover the UN Sustainable Development Goals and the 9 key indicators of planetary health.
- an effective and monitoring framework with year on year progress towards these targets, and the ability to review policies to ensure that progress is on track.

SA topic areas (please refer also to table in Appendix 1 below)

1. Carbon emissions

'Oxford is still far from achieving its 2040 target of net zero carbon emissions.' [LP 2045]

Impact: Scope 3 embodied carbon emissions (construction of buildings and associated new infrastructure) would form the majority of the carbon emissions of the 2045 Local Plan, but these are absent from the SA/SEA.

The improvement in rating from orange currently to yellow is consequently unjustified and should be revised to show a strongly negative red impact.

There is a binding legal commitment to meet the UK's annual carbon budget to reach net zero by 2050. Oxford's 2045 Local Plan would have significant adverse effects on the ability to meet this commitment.

Monitoring: Both the offsetting operational carbon and the change in per capita CO2 emissions as proposed monitoring ignore the much more significant impact of embodied carbon emissions. In addition, exporting operational impacts by offsetting is undeliverable, and is unsustainable globally. So this is not positively prepared, not justified, nor effective and fails to meet national policy.

Solutions: Embodied carbon assessment of all development should be mandatory and monitored annually over the plan period.

2. Climate Change Resilience

Oxfordshire County Council's climate vulnerability assessment 2024 identifies Oxford as having some of the most at risk areas in the County in respect of flooding and heat waves. (Background paper 008)

Much of Oxford is prone to flooding: this is likely to increase with climate change.

However [Policy G7](#) allows development within Flood Zones 2 or 3 and the continued redevelopment of FZ 3b.

LP 2045 admits that OFAS cannot mitigate these risks.

Impact and monitoring: The policies in the LP are not sufficiently robust to support genuine climate change resilience. In particular, for resilience to flooding mitigation, NO building should be permitted on Flood Zone 3 areas given known and current effects of climate change on the increasing frequency of severe rainfall events. Preventing development in FZ3 and adhering to advice from the EA should both be boundary conditions; not seen as monitoring measures. As proposed, this policy is unsound.

Solutions

Prevent any development in FZ3

Flood Zone 2 should be included as a constraint to development

All green spaces and mature trees should be protected

3. Efficient use of Land

Policy HD2: Making efficient use of land has a very narrow application focused on achieving greatest housing density on a site by site basis.

The Plan acknowledges that land in Oxford is a finite resource under increasing pressure but fails to tackle the complexity and multifunctionality that is required

For 'efficient use of land' to be sustainable it should involve a balanced consideration of all sites for the optimal delivery of environmental, social and economic objectives as a whole.

Impact: The SA fails to register any impact of the 2045 LP on efficient use of land. Instead it states that it is the high housing need which puts more pressure on green field sites. In reality it is the employment-led growth of this plan that is driving housing onto green spaces by reserving hundreds of acres of brownfield land for new jobs rather than homes, and further inflating the housing demand. This is unsustainable.

Monitoring: gives the indicator of efficient land use as 'applications permitted on protected green space' This is nonsensical given that 'protected' green space should signify protection from development.

Solutions

- Brownfield employment sites and redundant office and retail should be prioritized for housing and new green spaces created
- housing should be of higher density (100 - 200 dpa) to preserve Oxford's remaining green spaces and conservation areas
- preservation of 'protected' green space should be a boundary condition
- monitoring could instead be measured by the number of homes located on brownfield land and by retrofitting redundant employment / retail sites for new homes

4. & 5. Local housing need and inequalities

Impacts: It is well known that economic growth in already-developed countries increases inequality, as has resulted over the period of Oxford's growth in the previous Local Plan. It is no accident that Oxford and Cambridge, both University cities prioritizing growth through the development of tech over housing, are the two most unequal cities in the UK.

The inability to afford housing in the city has a major impact on inequality, and the plan will worsen the current unaffordability by:

- failing to prioritize or provide any significant solutions to meet the need for genuinely and permanently affordable housing
 - prioritizing employment over the delivery of affordable housing, which will increase housing demand and house prices.
 - failing to define 'affordability' in terms of being affordable to key workers
 - allowing 'shared ownership' to be included in the 'affordable homes' category, a scheme which is not actually affordable to the majority of key workers
 - reducing the requirement for socially rented housing to 30% (the 2036 LP required 40%)
- As a result the SA assessment of impacts on housing and inequality are unsound.

Solutions:

- homes should be prioritized over jobs in a city with a housing crisis but full employment
- affordability should be defined according to key-worker salary
- mechanisms should be found to prevent loss of housing for social rents into the private sector (eg: through ownership by Community Land Trusts)
- tech jobs should be located in areas of the UK where there is currently unemployment and cheaper housing consistent with leveling up

6, & 7. Services and facilities, leisure and recreation

Impact: Oxford's Local Plans (previous and current) are having severe impacts on community services and facilities with loss of green space and recreation areas, and reduction in the size of community centers. But the SA fails to register any impact of the 2045 Local Plan on this key infrastructure, and merely *aims* to provide adequate infrastructure and prevent further loss of community facilities. Without a requirement to provide improved community services and facilities, the planned increase in Oxford's population by 30% will lead to huge stress on the current already overstretched services and facilities, and places for leisure and recreation, and reduce community cohesion. This is not in keeping with sustainable development.

Solutions

- To be sustainable, the plan should require an increase in provision of services and facilities in line with planned population increase.

8. Traffic and Air pollution

Impact: the SA/SEA registers a strongly positive impact on reducing traffic and air pollution despite the huge increase in commuting that will result from generation of new jobs in the city whilst exporting the resulting housing requirement to the districts. The Oxfordshire Local Transport and Connectivity Plan aims to reduce *current* car trips in Oxfordshire by 50%, but this does not include the *new* car trips generated by the Local Plan. This SA assessment of traffic and air pollution is not justified, not effective or positively prepared.

Solutions

- Achieve a better balance between housing and employment and co-locate the number and location of jobs with the appropriate level of housing provision.

9. Water

Impact: the SA/SEA predicts a positive impact on **water quality** despite plans for 9,267 new homes and up to 50,000 new jobs . The plans for new sewage infrastructure will fall short of meeting these demands, and green infrastructure will be lost due to the allocation of greenfield sites for development. No mention is made of the impact of polluting discharges by tech labs on water quality.

A major omission in the sustainability appraisal is the effect of the LP on **fresh water withdrawals**, even though the LP acknowledges that Oxford and Oxfordshire are already under severe water stress and that this will significantly worsen the high water demands of increased bio-tech and planned in the City, and the demands of a 30% increase in population in the context of escalating climate change and drought. This SA assessment of water quality and fresh water withdrawals is not justified, not effective or positively prepared.

Monitoring: river water quality is to be monitored every 3 years which is wholly ineffective.

Solutions:

- reduce development plans to those which can be managed by water infrastructure (both fresh water supply and sewage treatment)
- prevent any further loss of green infrastructure
- join up with the water quality monitoring already being performed by local communities and ensure weekly monitoring, of what has become a national scandal
- assess likely impact of new tech labs on water use and quality, revising the plan accordingly

10. Biodiversity:

Impacts: the plan will significantly reduce Oxford's biodiversity by

- building on greenfield sites
- reducing biodiversity on the remaining green space by fragmentation of habitats, increased air and water pollution
- failing to require a BNG above 10% as one of the most nature-depleted Counties in the UK, and the UK one of the most nature-depleted countries in the world. 10% BNG is the minimum to avoid net loss (as identified by DEFRA) and the Oxfordshire Local Nature Partnership has provided the evidence to justify more than the minimum 10% BNG requirement.

Monitoring: no target is specified for monitoring BNG and no indicator is used to prevent fragmentation of habitats, making the stated aim to '[Secure strong, well-connected ecological networks and net gains in biodiversity](#)' is unachievable. [BP 005]

Solutions

- Protection of all core green infrastructure should be a requirement
- no green field sites should be used unless other alternatives have been exhausted
- a target of 30 % BNG should be applied to ensure a gain can be achieved.
- connectivity of Oxford's green spaces should be preserved to avoid biodiversity loss due to habitat fragmentation.

- build in principles of ongoing consultation and co-development with Oxfordshire Local Nature Partnership and Oxfordshire Local Nature Recovery Strategy managers.
- provide proactive strategic planning for nature recovery, with a vision and targets of what will be achieved.
- develop and publish a detailed version of the Nature Recovery Network covering the Oxford City area, together with commentary on key assets and especially irreplaceable habitats as advised by DEFRA, along with directives on how to specially treat these, for example buffering from pollution sources, enhancing connectivity.

11. Design and Heritage

Impacts: The plan admits to impacts in this topic due to proposed development on 19 greenfield sites and 15 conservation areas

Solutions:

- protect all greenfield sites and conservation areas to reduce the amount of the development in the city, as these provide multiple benefits across social (health and wellbeing, sense of place, nature connection, equitable access) and environmental (carbon, biodiversity, flood risk, urban cooling, water quality, air pollution) topics as well as being a vital draw to visitor numbers which underpin the sustainability of the local economy

12. Economic growth

Impact: The plan vision to support research and development in Oxford claims that ‘the plan focuses on providing housing over new employment land.’

The local plan is instead skewed in favour of meeting all identified employment ‘needs’ within and around Oxford (with the ambition to create 50,000 jobs) and an additional 412,460 m² of employment floor space within the city. This fails to prioritise the stated aim for desperately needed affordable housing provision. This unprecedented expansion for new tech jobs will increase the demand for housing (because Oxford has full employment, these high skill sector jobs will simply attract new residents) and further worsen affordability.

Solution

Reduce the strong emphasis on tech jobs in and around Oxford itself, in favour of working with surrounding Oxfordshire districts to encourage appropriate job creation in areas which need it most and levelling up more widely UK wide.

Summary

The Local Plan 2045 vision sets out strong social and environmental objectives:

In 2045 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. 2 Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising

opportunities to look forwards to innovate, learn and enable businesses to prosper. The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges.

The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. Resources will be utilised prudently whilst mitigating our impacts on the soil, water, and air.

The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.

But these laudable social and environmental aspirations are not supported by actual requirements in the LP policies, resulting in a plan which fails to balance social, environmental and economic sustainability as required by the NPPF. Instead the plan hugely accelerates the provision of new tech jobs in a city with full employment, to the detriment of current and future resilience of the city.

Solutions:

If the LP 2045 is to achieve balanced outcomes for the whole city, then the current narrow focus on the research and development aspirations of Oxford University needs a more open-mindedly innovative approach, harnessing the opportunities for remote working and leveling up across the UK and internationally. The proposed monitoring process for LP impacts should be overhauled to measure year on year genuine improvements across the 12 SA topics with data indicators to meet specific targets. Without this level of genuine and measurable scrutiny, the SA is a sham.

Appendix 1: Comparison of Reg19 SA/ SEA: Real LP 2045 impacts compared with OCC baseline, no action and current LP 2045 assessments

Key

Description of impact	Scoring symbol
Very positive impacts (compared to the current situation)	++
Positive impacts (compared to the current situation)	+
Neutral / none	0
Some positive and some negative impacts	+/-
Negative impacts (compared to the current situation)	-
Very negative impacts (compared to the current situation)	--
Unclear	?
Depends upon implementation	!

Reg19 SA: True impacts of LP 2045 compared with baseline, no action and current LP assessment					
Topic	Now	No plan	LP 2045	Rationale	True impacts of LP 2045
1. Carbon emissions				Justification for the yellow carbon reduction score of LP 2045 relates to electrification of the grid, However:	

				1. the majority of LP associated emissions are due to embodied carbon in construction and Policy R2 is purely aspirational and acknowledges the lack of national regulation on this matter. 2. the destruction of long-term carbon sinks due to development on greenfield sites, and the lack of future absorption is ignored. Conclusion: Construction emissions by far outweigh any reductions from national grid electrification.	
2. Resilience to Climate Change				No evidence has been produced to justify why the LP 2045 would decrease flood risk or urban heating in the face of increased development proposed by LP 2045 and more extreme rainfall and heatwaves.	
4. Local Housing need				<i>Oxford has very high housing costs, limited land available for housing, and difficulty in providing affordable housing.</i> <i>Policy S1 Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere;</i> The local plan is skewed in favour of meeting all identified employment 'needs' within and around Oxford (50,000 jobs) This fails to prioritise the stated aim for desperately needed affordable housing provision. And it will exacerbate the demand for housing and worsen affordability because Oxford has full employment. The SA states that '<i>Future employment growth in Oxford is likely to be in high-skill sectors</i>' and this will bring in a huge influx of new residents. Consequently LP 2045 impacts on meeting local housing need are not green but red.	
6. Green infrastructure and leisure			0	The planned increase in Oxford's population by 30% will lead to huge stress on the current already overstretched services and facilities, and places for leisure and recreation. The reduction from green ++ to zero score for LP 2045 impacts grossly underestimates loss and fragmentation of green space by the accelerating urbanisation. To be sustainable, the plan should mandate an increase in green infrastructure provision in line with planned population increase, the aspiration to increase BNG and the climate resilience required.	
7. Inequality				<i>'Oxford's overall prosperity masks localized areas of deprivation. There are sharp inequalities across the city in terms of opportunities, wellbeing and health, likely exacerbated by the cost of living crisis.'</i> It is well known that economic growth in already-developed countries increases inequality, as has resulted over the period of Oxford's growth in the previous Local Plan.	

				LP 2045 will worsen housing unaffordability and lead to further loss of public spaces, widening high levels of inequality across the city and risk societal unrest.	
9.Water				Freshwater LP 2045 SA/SEA admits measures are unlikely to mitigate additional demand. It is unclear whether the freshwater demands for Biotech and data centres have been factored in, along with the impacts of prolonged drought year on year. Waste water The Oxford Sewage works cannot meet current demand. Thames Water is on the verge of bankruptcy and requesting a licence to continue polluting for another 15 years. Water quality is likely to worsen with the growth plan for the city.	
10.Biodiversity		0		<i>'Oxford's constrained nature means there are competing pressures for land which can put open spaces and other green features under threat. Oxford currently has not got a surplus of sports pitches or allotments. Losses of green space can fragment the network and harm the wider functioning it provides, for example to climate change mitigation, biodiversity, and wellbeing. For all these reasons, no green space identified as part of the Green Infrastructure Network is considered surplus, and their loss without reprovion is not permitted.'</i> [LP 2045 Chapter 4] No evidence is given for how biodiversity can increase particularly as: - it cannot meaningfully be transplanted to another location. - BNG at just 10% only just breaks even and studies show a reduction in land area for nature. <i>The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient.[LP 2045 vision]</i> No evidence is given for how this vision can be achieved. Instead, the scale of urbanisation in LP 2045 will increase habitat fragmentation and pollution (water, air, noise, light) of green infrastructure making what remains much more susceptible to climate extremes and increased footfall.	

ODEC's review of LP 2045 Sustainability Appraisal shows it is unsound in failing to reflect the true impacts of the plan or provide effective monitoring. This prevents a resilient balance between social, environmental and economic sustainability from being achieved, as legally required by the NPPF.