

Oxford Local Plan 2045

Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name: Alex Veitch

Organisation (if applicable): Walsingham Planning

Address:

Email:

Date: 13/03/2026

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.

Do you wish to speak at the examination hearings?

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

Yes ☒ No ☐

Do you wish to be notified when:

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

☒ ☐

the Inspector's Report is published?

☒ ☐

the Oxford Local Plan 2045 is adopted by the Council?

☒ ☐

GENERAL ADVICE

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

When completing the form,

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

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team

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

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

T: 01865 252847

planningpolicy@oxford.gov.uk

www.oxford.gov.uk/localplan2040

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

Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

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

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

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

Paragraph

Policies Map

Policy Number

SPE9

Sustainability Appraisal

Q2. Do you consider that the document:

(a) is legally compliant?

☒ Yes

☐ No

(b) is sound?

☐ Yes

☒ No

☐

☐

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

(a) positively prepared?

☒

(c) effective?

☒

(b) justified?

☒

(d) consistent with national policy?

☒

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

Please refer to representation letter submitted via email.

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 refer to representation letter submitted via email.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Our Ref: AV/AD/B0039/25

12 March 2026

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

Via Online Submission

Dear Planning Policy,

Oxford Local Plan 2045: Regulation 19 Consultation – March 2026

I am writing on behalf of our client, Lucy Developments Ltd, in response to the 'Proposed Submission (Regulation 19) Consultation' as part of the preparation of Oxford City Local Plan 2045.

Our client controls a parcel of land at Butts Lane, Marston; Lucy Developments have a contract in place with the landowner. The site is shown on the enclosed 'Illustrative Concept Framework Plan (SK02)'. The site is approximately 0.9 hectares in size and could deliver a minimum of 20 new family homes.

Detailed representations were issued on behalf of our client at the Regulation 18 consultation stage (dated 8 August 2025). Those representations recognised positive aspects of the Plan but also highlighted that the highly sustainable site at Butts Lane could, and should, be allocated for the development of much needed new family homes. At that time, we advised that our client's site was Grey Belt, and this remains the case; it is therefore suitable for development through either allocation in the Local Plan or through the granting of planning permission in Development Management process.

Full details of the site were submitted to Oxford City Council in a letter and supporting documentation (dated 17 March 2025) in response to the City Council's last formal 'Call for Sites'. That submission set out comprehensive and robust evidence to demonstrate that the site is suitable, available and viable for residential development.

The City Council have drafted the following site allocation policy for part of our client's site: 'SPE9: Marston Paddock Extension'. The principle of this policy is supported but my client has a number of detailed comments as follows.



In an email to Walsingham Planning dated 19 December 2026, the Council confirmed that it is their intention to pull together an exceptional circumstances case to remove the 'Marston Paddock Extension' Site from the Green Belt. In our view, exceptional circumstances are not required because we consider the land to be Grey Belt.

Importantly, the red line area for the site shown in the draft local plan policy SPE9 is **not** reflective of the boundary of the site that my client controls, nor the site that was submitted as part of the 'Call for Sites' exercise. We set out below why the boundary of the site as shown in policy SPE9 should be amended to that of the red line boundary contained within our previous call for sites and Local Plan representations.

Our client would also like to take this opportunity to share that they are currently consulting on and are assessing the site being delivered as a 100% affordable scheme, with a potential partnership with OX Place.

The Vision and Objectives for Oxford 2045

The vision for Oxford in 2045 is divided into six themes – with objectives that build off these themes.

Those themes and objectives are interrelated, but they can only be achieved individually and collectively by dealing positively and effectively with the housing crisis – a crisis that directly affects Oxford City through severe affordability issues and a significant shortage of both market and affordable new homes. In this respect, the objective of maximising capacity for delivering homes across the City is supported. However, all opportunities must be taken to deliver new homes on sites within the City's boundary that are suitable, available and deliverable and meet the requirements of national planning policy. Those opportunities can and must include the development of sites that are in the Green Belt.

Our client's land can contribute new family homes towards meeting the needs and the vision of the City to 2045.

Local Plan Evidence Base

Oxford Strategic Housing Land Availability Assessment (SHLAA) January 2026

The 'site' (the boundary as drawn by the City Council) which is known as 'Marston Paddock Extension' was assessed in the SHLAA (2026) and given reference I14e.

Our client agrees with the policy considerations and physical/environment considerations as set out in the document. We would query the extent to which the site supports the function of the green infrastructure network – with its strong connection with urban form to the north, south and west, and its proximity to the A40. The site is not strategically planned as part of a wider green network, is of relatively low environmental quality and is not accessible by the public.

The site is assessed to be suitable, available, and viable. The SHLAA highlights that the site is expected to be delivered within the plan period. Our client fully supports these conclusions.



The SHLAA sets out that the 'site' has a total area of 0.51ha. The land within our client's control is approximately 0.9ha in size. The site capacity of 20 as set out in the SHLAA is based on a total site area of 0.51ha. Whilst it is understood that site capacity at this early stage is somewhat indicative, our client supports the wording in draft Policy SPE9, which states: "*The minimum number of homes to be delivered is 20.*" Further design work and investigation will ultimately determine the number of homes to be delivered, but it is considered that 20 homes should be treated as an absolute minimum. We set out below that in order for a minimum of 20 dwellings to be achieved, the red line area needs to be increased so that it aligns with what we have previously submitted.

2023 Green Belt Assessment of Additional Sites

Our client's site was reviewed in the 2023 Green Belt Assessment as part of a larger parcel of the Green Belt under site reference '114(a) – Land at Marston Brook (northern part)'. Our client's land forms only a small part of this 114(a) area and the difference between the full extent of my client's land and the wider parcel of 114(a) can be seen by looking at the red line area on the enclosed plan SK02.

The physical characteristics of our client's site and the wider area included in 114(a) are **significant**.

Site 114(a) was assessed as a single parcel and described as comprising a "*pastoral field and woodland which adjoins the north-eastern edge of Marston*". The entire site was further described as "*open and undeveloped*" at section 4.3 of the Green Belt Assessment. The majority of our client's site is comprised of previously developed land (PDL), with some greenfield; it is fundamentally not "*pastoral field and woodland*" or "*undeveloped farmland*" as described in Chapter 4 of the assessment.

The parcel (114a) was assessed to contribute to the historic setting of the City, and the report concluded that release of the site would cause moderate-high harm to the Green Belt purposes. This negative assessment is considered to be in relation to parts of the site outside of our client's control and therefore fundamentally different in terms of the assessment against the requirements of the NPPF.

In August 2025 our client made a formal request to the LPA as part of their representations to the Reg 18 consultation that a thorough Grey Belt and Green Belt assessment of their land was undertaken in complete isolation from the rest of the land identified withing site 114(a).

Oxford Green Belt Additional Site Assessment 2025 – Final

The 2025 Green Belt Assessment once again assessed parcel 114(a) as single parcel totalling 3.56ha in area, concluding that there "*has been no change since 2023 that would alter this conclusion.*" Section 5.35 of the 2025 report states that: "*The site is considered to make a strong contribution to Green Belt Purpose D and so is not grey belt.*"

The assessment does state that: "*Development here would not, however, fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.*"



The assessment at section 5.34 highlights that “the release of land to the north-west (allocation SP23), outside of the Conservation Area, does not significantly diminish the site’s role.” This of relevance and is discussed later in this letter of representation; allocation SP23 is titled ‘Marston Paddock Site’.

Grey Belt – Site Assessment

Background

For the purposes of plan-making and decision-making, ‘Grey Belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143, and excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. The three of the five purposes of Green Belt mentioned within the definition are:

- a) to check the unrestricted sprawl of large built-up areas
- b) to prevent neighbouring towns merging into one another
- d) to preserve the setting and special character of historic towns

Relationship with the Marston Paddock Site

The accompanying Illustrative Masterplan seeks to effectively demonstrate how the Butts Lane Site relates to the Marston Paddock Site.

Our client’s assessment that their site is Grey Belt is fully supported by the 2017 Green Belt Assessment of allocation SP23 in the adopted Oxford Local Plan. The Marston Paddock Site (SP23) is located immediately to the north of our client’s site subject of this representation and is being built out by Lucy Developments Ltd. The Marston Paddock Site was removed from the Green Belt following the sites allocation for housing development in the current Oxford Local Plan. The Green Belt Study (LUC 2017) assessed the potential harm to the Green Belt that could result from the release of eleven potential sites – Marston Paddock (HELAA Site no. 114d) was assessed as single parcel and given a ‘low moderate’ rating for the harm to Green Belt resulting from its release.

At the time of the assessment and the allocation, the Marston Paddock Site was undeveloped “pasture field with a scattering of young trees and shrubs”. The assessment was undertaken against each of the 5 purposes of the Green Belt and stated against each:

- Purpose a) - The A40 forms the urban edge to the north of Marston and Headington, so land within its confines has a stronger relationship with the urban area than with the wider countryside. Within this area parcel 114d is largely contained by the urban form, so development would not constitute significant sprawl.
- Purpose b) - The strong relationship between the parcel and the urban area means that it makes no contribution to settlement separation.



- Purpose c) - The parcel is undeveloped but has a stronger relationship with the urban area than the wider countryside, and it forms part of an area of Green Belt that is dominated by urban fringe uses.
- Purpose d) - The parcel is not in a location that makes any contribution to Oxford's historic setting or special character.
- Purposes e) - All parcels are considered to make an equal contribution to this purpose.

The concept of 'Grey Belt' was formally introduced into UK planning policy in December 2024 but the Green Belt purposes a) – e) used in LUC's Green Belt Study (2017) are taken from paragraph 80 of the 2012 version of the NPPF and are reflective of the current Green Belt purposes set out in the latest version of the NPPF.

The conclusion of the assessment of I14d was that:

"The parcel has a strong relationship with the urban form, and is part of an area of Green Belt that also has a strong relationship with the urban area and is separated from the wider countryside by the A40. Release of this parcel would not weaken the Green Belt boundary but would slightly weaken the Green Belt contribution of the small fields immediately to the south and east."

The conclusion recognises that the parcel was part of an area of Green Belt that had a strong relationship with the urban area. Today, our client's site at Butts Lane has a much stronger connection with urban form than the Marston Paddock Site had when assessed in the 2017 Green Belt Study. It is considered in the current context that no part of our client's site makes a **significant** contribution to the historic setting of Old Marston, and in turn that of Oxford.

The key, important difference between our client's land subject of this representation and the 2017 assessment of SP23, is that our client's land is predominantly previously developed land. This further reinforces that the site does not contribute strongly to any of the Green Belt purposes and is Grey Belt. The western and central parts of the site which currently comprise the farmhouse, associated outbuildings, access track and its curtilage is considered to be PDL.

Further, release of the Marston Paddock Site was assessed to slightly weaken the Green Belt contribution of the small fields immediately to the south and east i.e. the Butts Lane Site. The Green Belt Study (2017) identified that Elsfield Road to the south would constitute a stronger edge to the Green Belt boundary, an assessment that we entirely agree with.

Policy SPE9: Marston Paddock Extension

Our client mostly agrees with the wording and provisions of Policy SPE9 as drafted.

The point of contention is the red line area of the site and subsequently the site area.

The draft allocation seeks to deliver a minimum of 20 homes on the 0.51ha site. Future development should secure green amenity space, green links through the site, and sufficient buffering and screening along boundaries. The scheme will also need to deliver at least a 10% increase in BNG. Further, only



relatively low density is likely to be appropriate. To deliver a scheme that meets these criteria and a minimum of 20 dwellings, it will be necessary to utilise the **entire site**, as is shown on the illustrative masterplan.

The illustrative masterplan shows the area most appropriate for residential development; measuring 0.53ha, which at 34-38dph would provide 18-20 units. The north-east section of the site closest to the A40 is indicatively deemed most suitable for open green space and supporting blue infrastructure.

We would also take this opportunity to clarify that Lucy Developments Ltd are not the landowner, they are acting on behalf of the landowner. This is stated by the Council within the informative table for draft Policy SPE9.

Conclusions

Our client's site has not been assessed as a single parcel in the previous Green Belt Studies. If it would have been, based on the above, it is our strong contention that the site would have been given the same 'low moderate' rating as the Marston Paddock Site immediately to the north.

Today, our client's site at Butts Lane has a much stronger connection with urban form than the Marston Paddock Site had when assessed in the 2017 Green Belt Study. No part of our client's site makes a significant contribution to the historic setting of Old Marston, and in turn that of Oxford. Contrary to the latest Green Belt Assessment, our client's site does **not** make a strong contribution to Green Belt Purpose D and is therefore Grey Belt.

Our client's site comprises previously developed land and a small area of undeveloped land that does not **strongly** contribute to the purposes (a), (b) or (d) of paragraph 143 of the Framework. In addition, the indicative proposals would not affect areas or assets in Footnote 7 of the Framework (other than Green Belt). Residential development on this site would therefore utilise Grey Belt land.

It is requested that the site boundary is re-drawn for Policy SPE9 to include the entirety of the land under our client's control, reflective of the site boundary as shown on the enclosed illustrative masterplan.

Our client is currently consulting on and assessing the site being delivered as a 100% affordable scheme, with a potential partnership with OX Place.

We would be happy to meet to discuss this representation further.

My client is keen to engage in pre-application discussions with the City Council as soon as possible. We will also be happy to discuss and enter into a Statement of Common Ground for the Local Plan Examination process.

I would be grateful if you could please acknowledge safe receipt of this response.

We look forward to hearing from you.



[Redacted signature block]

Yours faithfully,

/
[Redacted signature]

Alan Divall MRTPI

[Redacted contact information]

Enc.



[Redacted footer text]

Response ID ANON-M2Q4-48W7-X

Submitted to Oxford Local Plan 2045 Submission Draft (Regulation 19) Consultation
Submitted on 2026-03-12 17:21:58

Contact Information

1 Name

Name:
Alex Veitch

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5 Organisation Name (if applicable)

Organisation:
Walsingham Planning

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?:
Lucy Developments Ltd

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:

It may be necessary to provide further evidence or justification for the modifications sought.

Policy SPE9 : Marston Paddock extension

431 Do you consider that Policy SPE9 is sound?

No

432 If you do NOT consider policy SPE9 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

SPE9 comments:

Please refer to representation letter submitted via email.

433 Do you consider that Policy SPE9 is legally compliant? If you do NOT consider policy SPE9 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

Yes

SPE9 legal compliance comments:

Please refer to representation letter submitted via email.

434 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 SPE9 sound:

Please refer to representation letter submitted via email.