Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Julie Martin

Organisation (if applicable): Divinity Road Area Residents' Association (DRARA)

Address: [redacted]

Email: [redacted]

Date: 10 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	Various	Policies Map	Various
Policy Number	Various	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 see attached pdf consultation response which covers an interrelated range of policy and site allocation issues.

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 see attached pdf consultation response which covers an interrelated range of policy and site allocation issues.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Divinity Road Area Residents' Association (DRARA) Response to Oxford Local Plan 2045 (Regulation 19) Consultation

Dear Planning Policy Team

I am responding to this consultation on behalf of Divinity Road Area Residents' Association (DRARA). The association has a membership of just under two hundred households, representing around one third of all households in the area. The response has been discussed and agreed amongst our committee members and also reflects of the views of many individual residents.

We note the need at this stage in the consultation to focus on soundness and legal compliance. Our response builds on the comments we submitted at the previous (Regulation 18) stage (please see our email submission of 5 August 2025).

In general, we are very disappointed to see that so few of the comments that we made during the previous consultation have been taken on board, although we do welcome the fact that site 665, Oriel College Sports Ground, has not been the subject of a site allocation for housing.[1]

STRATEGY AND POLICIES ON HOUSING AND EMPLOYMENT

We endorse the consultation response submitted by local think tank POETS (Planning Oxfordshire's Environment and Transport Sustainably) in respect of policies on housing and employment.

We consider the Local Plan strategy of meeting all identified employment needs arising within the city, hence increasing the demand for housing on greenfield sites both inside the city and in neighbouring districts, is not sustainable and is not an appropriate strategy. Our Regulation 18 comments in this respect (and those of many others) appear to have been ignored.

Although the plan purports to have a flexible approach to supporting housing delivery on employment sites, in practice it appears very reluctant and is highly constrained. It is likely that the current jobs to housing imbalance will increase over the plan period, and encourage car use, worsening traffic congestion, road safety and environmental problems. It will store up problems for the future with no effective ways of solving them.

The strategy is not consistent with NPPF, para 111 a) as it fails to support an appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. Neither is it consistent with NPPF, para 8 on sustainable development, which seeks a range of homes to meet the needs of present and future generations. Finally, it is not consistent with NPPF, para 124, which calls for a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

We endorse the list of specific modifications that should be made to the Local Plan that have been proposed by POETS (see link above, para 3). Without these modifications, we consider that the Local

[1] But note that the Regulation 18 Consultation Report fails to include the detailed comments that we made in relation to this site – an omission that we would like to see rectified please.

Plan fails to meet two of the four tests of soundness, as it is neither properly justified, nor consistent with national policy.

SITE ALLOCATIONS

As per our Regulation 18 consultation response and our comments above on housing and employment policy, our overall position is that all housing need should be met without new site allocations on greenfield land. The city has a huge area of mainly brownfield land set aside for new office and lab space, and more of this land could and should be used for housing. Any additional housing allocations should be made there rather than pushing new housing onto the city's dwindling green spaces and sites of heritage interest, in direct conflict with NPPF paras 124 and 125 c).

Hence we believe that the proposed site allocations for housing on greenfield land in close proximity to our area (SPE2: East Oxford Bowls Club; SPE4: Jesus College Sports Area; and SPE7: Lincoln College Sports Ground) are unsound. They are not properly justified and they conflict with national policy. Moreover, if these sites were to be developed, they would bring considerable, unnecessary, environmental damage to the local green infrastructure network and to the setting of Bartlemas Conservation Area and its associated heritage assets, also conflicting with Local Plan's own strategic policy S1 criteria f), g) and h).

We are concerned about the cumulative impact of development at these three sites on the character and special qualities of Bartlemas Conservation Area - which has already been adversely affected by development of student Housing at Sinnet Court on its north-west fringes some years ago. The Conservation Area represents a surviving fragment of Oxford's original farmed landscape setting. The Conservation Area Appraisal, describing the vulnerability of the Area, states that *"The rural 'undeveloped' character of Bartlemas is paramount to the area's significance"* and that *"the historic elements of seclusion and isolation should be preserved and their characteristics enhanced"*.

We are especially concerned at the proposed allocation of SPE2: East Oxford Bowls Club for housing. As per our previous consultation response, we believe this to be a greenfield site with a history of recreational use, not a brownfield site. It lies <u>within</u> Bartlemas Conservation Area and directly adjacent to Bartlemas Close Allotments which are identified as core green infrastructure, policy G1A. While the other two other larger sites (SPE4 and SPE7) are at least a short distance away, development of the Bowls Club would have a <u>direct</u> impact on the Conservation Area, affecting the 'countryside' setting of the listed Farmhouse and Chapel, the open views across the area to Oriel Wood on rising ground behind, and the wonderful, secluded character of Bartlemas Lane and Bartlemas Close Allotments, which could easily be overwhelmed by vegetation clearance, increased lighting, a new site access, additional traffic and other changes.

As a minimum therefore we would like to see the SPE2: East Oxford Bowls Club site allocation for residential development removed from the Local Plan. Of the three local sites proposed for housing, it would have the most significant impacts and yet would yield relatively little in terms of additional housing numbers.

Yours sincerely

Julie Martin
For Divinity Road Residents' Association (DRARA)