

Oxford Local Plan 2045

Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name:

Dr Judith Webb

Organisation (if applicable):

Address:

Email:

Date:

10.03.2026

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

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 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 Local Plan 2045 Consultation, Reg 19 stage

10.03.2026

Comment

From:

Judith A Webb BSc PhD BEM, [REDACTED]

Background/Experience of City issues

I'm an expert freelance ecologist who knows the City's biodiverse sites very well. I'm Chair of Friends of Lye Valley, I run practical volunteers in city council's Milham Ford Nature Park, volunteer with council Thursday Conservation Wildlife volunteers run by ODS rangers and give them informal site management advice and have outlined management plans. I have been contracted ecologist to survey green space wildlife sites for the city council. I'm particularly expert in Lowland Fen spring or seepage calcareous alkaline fen wildlife and hydrology such as exists in Lye valley and surrounding Headington areas.

Comments follow on some specific policies for site allocations:

Planning Policy for SPE 11 'Oxford Brookes Marston Road Campus' [103.1 SPE11 UNSOUND b.justified](#)

In the Notable Ecological Features box this sentence is not right:

'Milham Ford Nature Park, which lies directly adjacent and forms the eastern boundary of the site, and the internal quad formed within **Milham Ford School grounds** are both designated as Local Wildlife Sites.'

This does not make sense. The building has not been Milham Ford School for 23 years now and the Quad was never part of the grounds but within the building which is now 'Oxford Brookes Marston Road Campus'

[103.1 SPE11 suggested changes](#)

To make the situation clearer, how about some word changes as follows in that sentence:

Milham Ford Nature Park, which lies directly adjacent and forms the eastern boundary of the site, and the internal quad formed within **Oxford Brookes Marston Road Campus** are both designated as Local Wildlife Sites.'

[103.2 Policies Map UNSOUND b.justified](#)

On the 'Appendix 5 Draft Policies Map' there are some errors on mapping the site as follows:

'Oxford Brookes Marston Road Campus' is indicated as site code SPE 10, not SPE 11 as in the 'Appendix 08 Infrastructure AOF and Site Allocations' document.

ALSO

‘Milham Ford Field and Quad LWS 50I05’ seems not indicated on the map by horizontal bar green bars as are other LWS within the city. It is clearly on the **Oxford City Local Wildlife Sites list at**

https://www.tverc.org/sites/default/files/2025-07/Oxford%20City_list_2025_v1.pdf

Planning Policy for SPE 14 Ruskin Field 103.4 SPE14 UNSOUND b.justified

Around the northern side of Headington hill there are a number of small spring or seepage alkaline calcareous fen sites fed by the Headington Limestone and with significant peat formation; more are being discovered. Known examples are in Dunstan Park and at the Oxford Preservation Trust’s Larkins Lane site. Recently I had the opportunity to view the long garden of No 6 Dunstan Road adjacent to Ruskin Fields with the landowner’s permission. I found another small calcareous spring fen site in this garden on the eastern boundary and it was obvious a depth of peat is present over a 30m wide area, maybe as much peat volume as in Dunstan Park. Water flow from this small fen travels downslope towards the **north-western Field of SPE 14 centre grid ref SP 54295 08073** which is planned to take an access road to the Ruskin fields to the east and some new buildings. Looking over the fence and examining the Google aerial image it is obvious from the rushes growing that this is also a very wet field. It may have an additional spring water emergence area or be fed from the spring fen upslope in the garden. This is likely to have some accumulated peat deposits present. It is therefore unsuitable for any development at all and better restored to a more biodiverse wetland.

103.3 SPE13 UNSOUND b.justified

Planning Policy for Ruskin Campus site SPE 13

I’m still concerned about water flow downslope from a spring emergence zone just to the northern edge of the red line limit of this campus development where I have seen a flowing spring, marsh plants and peat development a few years ago. There is probably some degree of artesian pressure. How will campus development not interrupt this flow and keep it unpolluted?

This spring water will keep on flowing and affecting the fields in site SPE 14 below. ‘Biodiversity enhancements’ are being suggested for this zone between the two sites as a consequence of development. Enhancing the zone here would entail probably retaining water by blocking drainage, removing scrub and making a really wet fen habitat as was historically the situation before damaging drainage. Public access would need to be restricted due to wetness (it cannot be a pocket park) and the site would need annual vegetation management such as happens in Lye Valley SSSI. A wetland site sandwiched between two urban development sites where public access is banned due to fragile peat seems unlikely to survive or be much appreciated to me. It would be isolated; development never helps wildlife in my experience, despite all claims. All such important calcareous spring-fen sites need a wide green undeveloped buffer and good green connectivity to other wetland sites around the hillside for specific fen invertebrates to move between them, and good annual cutting/ raking management must happen in perpetuity to preserve returning plant biodiversity. How will this

be ensured and make things better for the wetland wildlife than the current situation of being in a totally green undeveloped surrounding area?