www.oxford.gov.uk
OXFORD CITY COUNCIL

Oxford Local Plan 2045
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Vaughan Lewis

Organisation (if applicable): Windrush Against Sewage Pollution (WASP)

Address: [redacted]

Email: [redacted]

Date: 12 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	R5	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.

The policy addressing sewqge pollution does not adequately address the seriousness of the situtation.

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 WASP's submission

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Policy R5

Regulation 19 Response

Windrush Against Sewage Pollution

Please see https://www.gov.uk/government/publications/local-plans-pre-examination-checklists for more detail on each area, especially legal compliance

Do you consider that Policy R5 is sound? No

If you do NOT consider policy R5 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 ☒

Fails to provide a strategy which, as a minimum, seeks to meet objectively assessed needs and is informed by agreements with other authorities and is consistent with achieving sustainable development. The use of Grampian conditions must be included in this policy.

Policy is NOT justified ☒

It lacks an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

Policy is NOT effective policy ☒

It is not deliverable over the entire Plan period

Policy is NOT consistent with national policy ☒

Fails to provide sustainable development consistent with NPPF and other relevant policies

Detailed comment :

The proposed policy R5 fails to address the problem of increasing amounts of sewage being sent to the Oxford Sewage Treatment works. There is no justification set out in the section concerning Policy R5 or in the Sustainability Assessment as to when or how Thames Water will be able to adequately treat the increased sewage from any new development in Oxford. The policy should be based on a realistic appraisal of Thames Water's actual ability to treat sewage at the time any planning application is made and should take into account that little improvement is expected in this regard until 2027 at the earliest with 2032 the more likely completion date under current Thames Water proposals.

Do you consider that Policy R5 is legally compliant? If you do NOT consider policy R5 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 ☐

No ☒

Comment :

see attached

Oxford STW – The Truth

Oxford has a become known not only for its dreaming spires, but more recently for its appalling sewage treatment works (STW), owned and managed by Thames Water (TW). A works so poor that in 2024/5 the Environment Agency (EA) did the unthinkable and submitted an outright objection to 1,450 new houses in Oxford

https://www.oxfordmail.co.uk/news/24218031.environment-agency-objects-1400-home-scheme-oxford/

and a large development in Oxpens https://www.oxfordmail.co.uk/news/24562483.environment-agency-objects-new-homes-scheme-oxpens/

largely on the basis of the inability of Oxford STW to accept the extra sewage generated.

This is not a new issue. The EA stated that Oxford STW was periodically non-compliant with its statutory discharge permit s far back as 2017, with that information communicated to TW on a number of occasions.

Detailed analysis of data from the works by Professor [redacted]Hammond of Windrush Against Sewage Pollution (WASP), revealed the true extent of the problems at Oxford, with untreated toxic sewage dumped into local rivers for at least 215 days between 2018-22

ILLEGAL SPILLS	2018	2019	2020	2021	2022	TOTAL
Dry only	0	4	2	3	0	9
Early only	36	28	79	27	10	180
Dry & Early	1	10	10	3	2	26
TOTAL	37	42	91	33	12	215
% illegal	73	39	71	55	60	

Summary by Professor [redacted]Hammond of illegal spills of untreated sewage from Oxford STW 2018-22 inclusive

In April 2021, the EA carried out a compliance assessment of Oxford STW. Its conclusions were damning. In a visit lasting less than 2 hours, they identified a litany of failings including ; the works inlet did not have the capacity to cope with the volume of incoming sewage, leading to 'early' (and illegal) dumping of raw sewage into local streams. Extensive infiltration of groundwater, in the absence of rain, resulted in prolonged (days or even weeks) of illegal 'dry' spilling. Storm tanks were not being properly used resulting in septic sewage spilling into local watercourses.

The EA's findings were conveyed formally to TW's Director of Science and Environmental Assurance on 25 October 2021.

But, despite these serious failings, no robust enforcement action was apparently taken by the EA. And that remains the position today.

In response to the EA's planning objection and residents' concerns about the sewage works, Oxford City Council (OCC) issued a position statement, which highlights the clear risk to the government's housing plans of the work's illegal operation.

Naively, OCC also stated 'We also understand that Thames Water is working at pace with the relevant regulators to develop and put in place solutions that seek to address the situation.'

https://www.oxford.gov.uk/news/article/1524/statement-on-the-state-of-oxfords-sewage-treatment-system-and-related-planning-objections

In 2021 in a letter to the Cherwell Catchment Partnership TW's external affairs director stated that Oxford STW would be upgraded by April 2025 at a cost of £41 million. By February 2024, that figure had risen to £130 million https://www.theguardian.com/environment/2024/feb/27/oxfordshire-housing-development-should-be-blocked-due-to-failing-sewage-system , and by September that year has unbelievably almost doubled to £240 million. https://utilityweek.co.uk/plans-advanced-for-240m-oxford-sewage-works-upgrade-after-council-criticism/

And then the real bombshell. TW did not, as previously agreed with Ofwat, deliver the upgrade on time (April 2025). Instead, they pushed back delivery until April 2030 as part of a package of 108 schemes they also failed to deliver, demanding an additional sum of £1.13 BILLON to do so. They had of course already been paid by us to do the work.

In January 2025, Thames Water then stated that the work would not be completed in 2030 but in 2032… at the eye -watering cost of £435 Million. https://www.thameswater.co.uk/about-us/performance/river-health/frequently-asked-questions/information-about-specific-sites#o

Interestingly, TW has stated that one of the key constraints at the Oxford STW site is lack of space. Indeed there is so little space, that they were able to form a consortium with other developers (amongst them same Oxford City Council who are apparently holding TW to account for its failures) to plan a huge South Oxford Science village on land adjacent to Oxford STW partially on land

owned by the water company https://www.cpreoxon.org.uk/news/plans-for-huge-urban-extension-into-green-belt-south-of-oxford/.

In April 2025, a new tighter standard was imposed by the EA on the effluent from Oxford STW, in recognition of the upgrade it committed to but has so far failed to deliver. This has instantly increased the amount of time that the works is operating illegally and of course poses a challenge to the EA.

Since then, under pressure from Defra and the Department of Housing and Community Development, the EA has agreed an interim enhancement to Oxford STW which should see an increase in capacity and larger storm tanks by 2027 at a cost of £270 million.

Given the parlous state of Thames Water finances and their inability to complete major improvement projects to time scales agreed with economic regulator (Ofwat) and the Environment Agency, WASP has no faith in the company's ability to meet these deadlines.

The weak, poorly worded and vague policies put forward in the draft local plan by OCCl to address the issues of sewage treatment are inadequate given the seriousness of the water quality problems facing the Northfield Brook and downstream River Thames.

A more strongly worded commitment is required by OCC in Policy 5 to link future development to the completion of committed upgrades at Oxford STW by Thames Water. That commitment should be made in the form of suitably worded Grampian conditions, preventing development above ground (this would allow enactment of the relevant planning permission but only to ground level) for all new planning applications discharging foul water to Oxford STW, until all committed upgrades at the works are completed by Thames Water, with confirmation provided by the Environment Agency.

Without such conditions being imposed, OCC will fail to link new developments to necessary increases in sewage treatment capacity in any meaningful way, ensuring the continued decline in quality of local watercourses.

Windrush Against Sewage Pollution (WASP) 12 March 2026