Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Heather Armitage

Organisation (if applicable):

Address: [redacted]

[redacted]

[redacted]

Email: [redacted]

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.

	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		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 <u>not</u>: (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 attached document refers to the methodology of public consultation.

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.

Repeat the consultation process.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

The Draft Oxford Local Plan 2045 is 'Unsound'

The Draft Local Plan is 'Unsound' because its 'public consultation' which should have been designed to ask people's views of the proposed policies instead, by misleading wording, led people to agree to a policy which, had it been expressed more clearly, they would never have agreed to.

Background

The people of Oxford love their green spaces. Green space is one of the reasons people cite for enjoying living in Oxford and coming to work here in the new labs, colleges and other places of employment.

Local residents support their green spaces with positive action, working on them on a voluntary basis. There are numerous 'Friends of' groups which help look after and enhance our parks eg Friends of Bury Knowle Park, Friends of Cutteslowe Park, our nature reserves eg Friends of Lye Valley, Friends of Raleigh Park, Friends of Chilswell Valley, Friends of Meadow Lane Nature Park, Friends of Warneford Meadow, our closed churchyards eg Friends of St Mary and John Churchyard as well as Neighbourhood groups who guard their green spaces fiercely eg Friends of Old Headington, Friends of Quarry, Divinity Road Residents' Association. In addition there are around 30 allotment sites which have for years been managed voluntarily by their members – unlike many cities where they are Council managed.

In fact, when Headington Neighbourhood Forum conducted a survey – the most thorough ever conducted in Headington, and possibly in the whole of Oxford, to make a valid foundation for the Headington Neighbourhood Plan, the issue which received the most support – way above Transport, Housing or Education was:

Conserve Green Spaces, and increase biodiversity and public access.

So public support for conserving and enhancing green spaces in Oxford cannot be doubted.

The Flawed Oxford City Council's Public Consultation Survey

The Council published two on-line surveys. One was a 'short' or 'quick' survey, presumably intended to appeal to people without the time to plough through detailed paperwork. The other was longer. The short

survey, coloured orange and green, was printed and dropped through residents' doors.

Under the heading, 'Taking Care of our Environment.' It states:

'We are protecting our important green spaces and features' and then asks how strongly people agree with this approach. Given the local affection for green spaces, who could disagree? What it does NOT make clear is that the Council is not referring to **all** our green spaces, so important for the mental and physical well-being of people. **It is referring only to the green spaces the Council considers important,** specifically those they are legally obliged retain like SSSIs, SACs etc. The rest are unprotected and presumably available for development should the Council wish to do so, on the pretext that the 'need' for development outweighs any amenity value. This is explained in the online documentation.

This survey question is deliberately misleading. It asks people to endorse a Local Plan policy which they would almost certainly reject if they knew what it really meant.

This is undemocratic and unethical and casts into doubt the value of the whole 'public consultation ' with it's strident cry, ' Let us have your views.'

In short, the draft 2042 Local Plan is unsound owing to the faulty process of Public Consultation which underpins it.

H Armitage

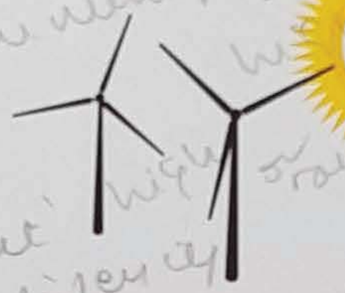
[redacted]

Images of the Headington forum Questionnaire and the Council's First Draft Local Plan Consultation questionnaire are attached.











OXFORD CITY COUNCIL

TAKING CARE OF OUR ENVIRONMENT

We think it is important that Oxford is a green biodiverse city that is resilient to and minimises our impact on climate change. Requiring low carbon and environmentally friendly buildings is something we should do. The quality of our built environment is also key to supporting a high standard of living, so we should promote good design across the whole of the city that respects heritage assets and their surroundings.



2 We are protecting our important green spaces and features. We are also requiring biodiversity enhancements and new green features on sites. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

3 We have drafted a policy that requires all new buildings are net zero carbon in operation from adoption of the plan. In a few exceptional cases, payment to offset carbon impacts will be allowed (for example for hospitals, which need to use more energy than it is likely can be generated onsite). To what extent to you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

4 Good design is about ensuring development functions positively for the people who live and work there and that it makes best use of land and respects heritage. We have also drafted a policy that requires high density development and efficient use of land first and foremost, alongside policies to ensure design respects heritage including views of the renowned skyline. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

SUPPORTING OXFORD'S SUCCESSFUL ECONOMY AND REDUCING INEQUALITIES

Oxford is a prosperous city, with a globally important role in learning, knowledge and education. However, there are inequalities across the city. Reducing these means there needs to be access to employment opportunities for all, as well as access to decent, affordable homes.

5 We have identified what we think are key employment sites in the city that we should protect. These are sites that support Oxford's internationally important role in education, research and health, and also those that support a diverse and strong economy. We are not protecting any employment sites in the city centre or district centres, to give full flexibility in those areas, for example to allow for offices to change use to housing. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

6 We propose requiring community employment plans so that work and training opportunities are given to local people. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

7 Affordable workspace is proposed as a new policy approach- the largest [illegible] be expected to deliver an affordable works[illegible] businesses. To what

Plan Objectives

The Plan has three overarching objectives which guide policy making throughout the Neighbourhood Plan process. These are:

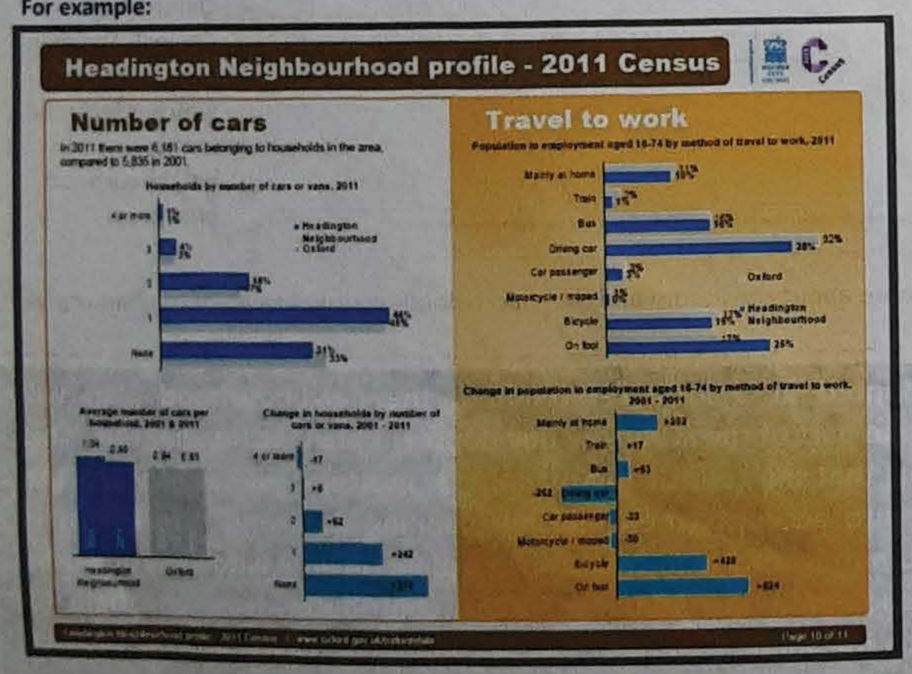
1. **Improving the quality of life for residents, workers and students**
2. **Establishing and promoting an identity which embraces the diverse nature of Headington**
3. **Fostering beneficial development**

What next?

We have been working hard to understand the issues in Headington by talking to the local community, and collecting information about housing, jobs, open spaces, transport, businesses and facilities.

For more on all these issues visit the Forum's webite HeadingtonPlan.org.uk or use this quick link: http://tinyurl.com/hplanissues

The Census and Local Plan help to form a 'rich picture' of Headington. Using this information, six Policy Groups made up of Headington residents, have set out what they consider to be some of the important issues for the local community For example:



Issues & Options

Please rate each of the issues below by placing a score (1-5) in the box. (1 is low importance, 5 is high importance)

EDUCATION IN HEADINGTON

Increase number of **places in schools**. ☐

Bring providers together in order to **raise educational attainment**. ☐

Enhance provision of **training and development**, and apprenticeships. ☐

CHARACTER & IDENTITY OF HEADINGTON

Strengthen Headington's distinctive identity to foster a sense of **community**. ☐

Identify and develop the special **characteristics of different districts**. ☐

Balance conservation and innovation within planning and development. ☐

AMENITIES & GREEN SPACES IN HEADINGTON

Conserve Green Spaces, and increase biodiversity and public access. ☐

Increase **access** to cultural & sports facilities in private and public ownership. ☐

Provide a **community and cultural centre** in central Headington. ☐

TRANSPORT IN HEADINGTON

Reduce **congestion** by facilitating cycling, walking and car sharing. ☐

Reduce through **traffic** and **speeds** in residential streets. ☐

Reduce traffic noise and improve **air quality.** ☐

RETAIL & BUSINESS IN HEADINGTON

Improve provision of **parking** to encourage shopping. ☐

Strengthen the local shopping **identity**. ☐

Encourage **retail variety**. ☐

HOUSING IN HEADINGTON

Provide housing mix and tenures to meet specific **social needs.** ☐

Ensure that **Houses in Multiple Occupation** comply with regulations. ☐

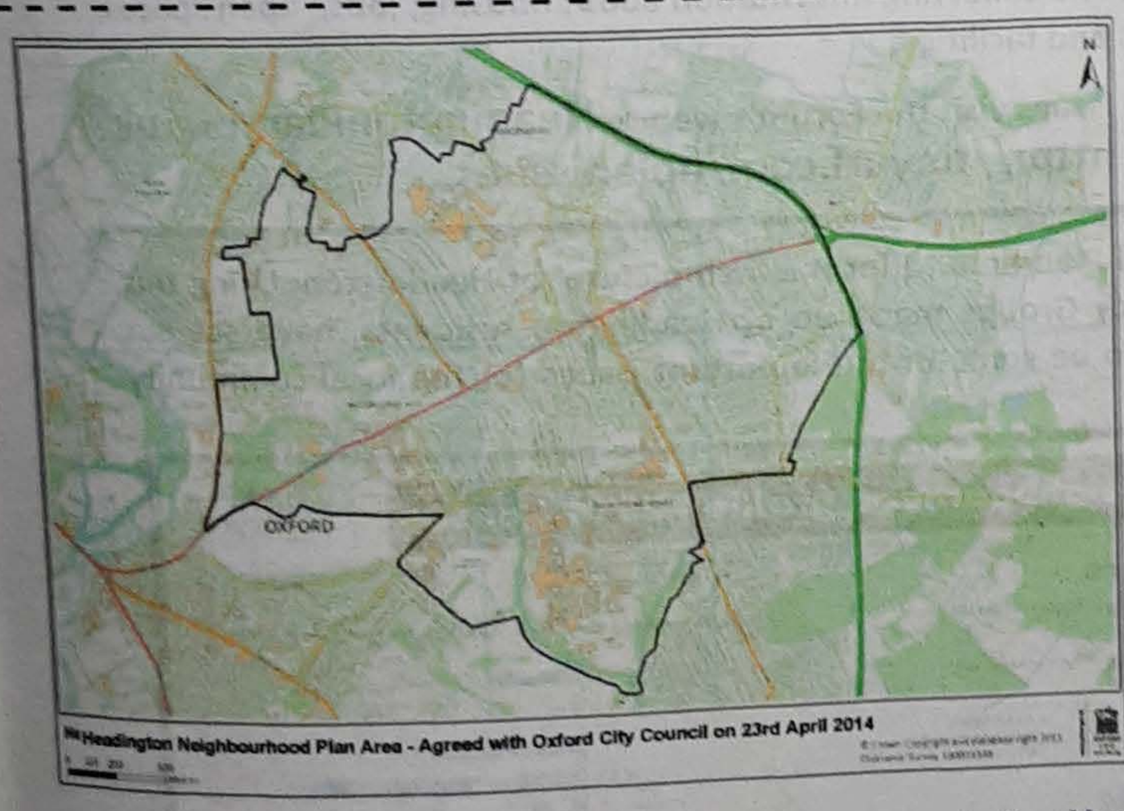
Build housing appropriate to the local **character**. ☐

Headington Neighbourhood Forum

Headington neighbourhood plan

Issues Consultation

This document sets out our suggested 'Issues and Options' which we hope will prompt local residents, workers, students, businesses and institutions to consider what are the most important issues, and try to identify how we solve them, Since April 2012, local communities have been able to take a lead in the future planning of their area through the preparation of neighbourhood plans.



Headington Neighbourhood Plan area was agreed through Consultation with residents, and approved by Oxford City Council. The map shows the area which is included in the neighbourhood plan area.

For more about the Forum and the map visit our website: **HeadingtonPlan.org.uk**

If adopted at a local referendum, the neighbourhood plan will become part of the statutory development plan for Headington. This means that the council and planning inspectors will have to take the plan into account when making planning decisions. The Forum is coordinating efforts to create such a plan. Anyone who lives or works in Headington can join the Forum, contribute ideas, and help to create the Plan. Together, we can influence development, protect and enhance the character of the area, and improve local facilities.