

Oxford Local Plan 2045

Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name:

Organisation (if applicable):

Address:

Email:

Date:

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?

☒ ☐

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

Chapter 1

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.

Chapter 1, INTRODUCTION AND STRATEGY

This is regarded as sound overall.

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

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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

Policy H1

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 emphasis on additional housing is appropriate to meet the affordable housing need in Oxford.

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.

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

Paragraph

Ch 2, pp 10-13

Policies Map

Policy Number

H8

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.

Creating mixed and balanced communities, and location of new student accommodation.

Although both are in principle sound, where - as in the case of New Marston (South) - there are three site allocations in a small community, all of which might involve additional student housing, planning needs to address the impact of the additional student accommodation on the overall mix and balance of the community. This aspect appears to be missing in the document.

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.

Addition of wording as follows:

"Where there is a concentration of site allocations in a small community, all of which might involve additional student housing, planning shall address the impact of the additional student accommodation on the overall mix and balance of the community."

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

Paragraph

Chapter 3

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.

Chapter 3, A FAIR AND PROSPEROUS CITY WITH A GLOBALLY IMPORTANT ROLE IN LEA
This is overall sound.
However, care needs to be taken that the concentration on Oxford's globally important r

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.

Care shall be taken so that the concentration on Oxford's globally important role does not

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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

Chapter 4

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.

Chapter 4 A GREEN BIODIVERSE CITY THAT IS RESILIENT TO CLIMATE CHANGE

This is sound.

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.

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

Paragraph	Chapter 5	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.

Chapter 5 A CITY THAT UTILISES ITS RESOURCES WITH CARE, PROTECTS THE AIR, WATER AND SOIL AND AIMS FOR NET ZERO CARBON

This is regarded as unsound with specific reference to drainage in New Marston and the impact that additional housing development will entail. It is noted in chapter 4 that reference is made to addressing flood risks and managing drainage particularly during wetter winters which are a feature of the changing climate. The current drainage system in New Marston (South) is not adequate: there is frequent flooding in winter with significant sewage overflow. During the winter of 2025/26 foul water (containing sewage) was a frequent occurrence in Ferry Road in New Marston (South), causing danger to health for those living in the road and those accessing the centre of Oxford via the busy cycle and walking route from Marston and Northway which crosses the bottom of Ferry Road. Additional housing proposed for New Marston will exacerbate local

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.

The current inadequate drainage system in New Marston (South) must be addressed to overcome the problems cited above, both now and in advance of any additional housing that is proposed in the the Plan.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

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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

HD4

Policies Map

Policy Number

SPE11

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.

Policy HD4: NON DESIGNATED HERITAGE ASSETS

The overall policy is sound in providing a degree of protection given to assets such as the Milham Ford School building, which is on the Oxford Heritage Asset Register, is welcomed. But we note with concern that that protection may not be sufficient. See our comments on site SPE11 Oxford Brookes Marston Road Campus further in the New Marston (South) Residents Association submission (in '10 NMSRA comments - 10.pdf' and '13 NMSRA comments - 13.pdf')

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.

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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

Chapter 7

Policies Map

Local Centres

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.

Chapter 7 A LIVABLE CITY WITH STRONG COMMUNITIES AND OPPORTUNITIES FOR ALL
While the policy is sound overall, it is unsound and not effective with reference to New M
It is unsound that the Policies Map does not designate the Old Marston Road shops – w

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.

For the policy to be effective, enhanced health and community facilities are required in New Marston. The Policies Map must designate the Old Marston Road shops – which include New Marston.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

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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	C6, C8	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.

Transport assessments should in addition address the frequency and otherwise adequacy of the public transport service. In a city the size of Oxford, a bus service of "at least 2 an hour" cannot be considered sufficiently frequent, nor adequate for those with mobility problems if 400 metres or more distant. Furthermore, the destination of the service needs to be considered and the number of changes required to reach likely needed destinations such as district centres or medical facilities. They also need to address the cumulative impact on an area of the development of more than one site, where relevant.

In the case of the Marston Road, the principal bus service, the X3, is every 20 minutes peak and half-hourly off-peak. It runs between Abingdon and the Barton. It does not serve the train station or the local district centres of Headington; to reach these requires changing bus with the consequent delays. Nor does it service the doctors' surgeries and dentists in Summertown. The

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.

C6: Transport assessments must also address the frequency and otherwise adequacy of the public transport service, including routes served. They need to address the cumulative impact of the number of developments in an area, where there is development on more than one site allocation.

C8: A public transport service of at least 4 an hour should be regarded as frequent within a city, not 2 an hour.

Please use an extra sheet if completing a paper copy.

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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

SPE3, SPE6, SPE11

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.

Policy SPE3: Government Buildings and Harcourt House, Policy SPE6: Land surrounding S
These three sites are in Marston Road, within about two-thirds of a mile of each other, and
While development of these three sites has been long foreshadowed and are not individ
The cumulative impact of 160 additional dwellings (or if delivered as students rooms, the equiv
• All three sites are stated in the plan to impact the New Marston Meadows. While each applicat
• The repeated flooding in heavy rain from the sewer in Ferry Road shows that the infrastructure
• An unknown factor is what Oxford Brookes University (OBU) intends to do in respect of the fur
• Each site has reasonable stated requirements for planning and landscaping, and there is welco

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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.

The three sites should be brought together in the plan to make clear their geographical proximity.

The document should address the cumulative impact of the three proposed developments on the already inadequate infrastructure of New Marston, on their impact on the New Marston Meadows SSSI and on the already failing sewerage system; the additional impact of any further development at the Clive Booth Student Village; and the careful development of a coherent plan for the integration of the three sites into the Marston Road in a way that reflects the character of the area.

Please use an extra sheet if completing a paper copy.

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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	SPE3	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.

Policy SPE3: Government Buildings and Harcourt House

Taken individually, sound, but the points made elsewhere in the New Marston (South) Residents Association's submission on cumulative impact and the need for coherent planning in the Marston Road apply.

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.

In the planning for this development, the cumulative impact of the other site allocations in the Marston Road and elsewhere in the vicinity must be taken into account, as set out elsewhere in the New Marston (South) Residents Association's submission.

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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

SPE6

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.

Taken individually, probably sound overall, but the points made elsewhere in the New M
However
Part of the site is stated to be in Flood Zone 3a. Developments in such areas are to be avoided ;
• Care needs to be taken to avoid light-spill onto St Clement's Church at night; the illuminated c
• Care should also be taken to minimise any adverse impact on the ecology of the river Cherwell
• Care also needs to be taken to avoid any negative impact on the 'Spire View' from South Parks.

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.

In the planning for this development, the cumulative impact of the other site allocations in
Careful consideration must be given to the development proceeding given that part of the s
Care must be taken to avoid light-spill onto St Clement's Church at night; the illuminated c
Care must be taken to minimise any adverse impact on the ecology of the river Cherwell (p
Care must be taken to avoid any negative impact on the 'Spires View' from South Parks.
The safety of the proposed road junction for the development must be given very careful c

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

Paragraph

SPE11

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.

Policy SPE11: Oxford Brookes Marston Road Campus

Unsound.

The reuse of the former Milham Ford School site is of course to be desired. However, the School

- The retention the Milham Ford Nature Park and the protection of its status as a Local Wildlife Site
- As is stated in the plan, the internal quad formed within the Milham Ford School grounds is de

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.

In the planning for this development, the cumulative impact of the other site allocations in the Marston Road and elsewhere in the vicinity must be taken into account, as set out elsewhere in the New Marston (South) Residents Association's submission.

The Milham Ford School building must be retained.

Care must be taken in any development of the School site not to adversely impact the Nature Park or the trees within and surrounding it. The Nature Park contains a water course which feeds three wildlife ponds. Any development of the site must preserve this key feature.

The internal quad formed within the Milham Ford School grounds, designated as a Local Wildlife Site, must be preserved.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form