Oxford Local Plan 2045 Comments

These comments are from Adam Wright in his capacity as Chair of the New Marston (South) Residents' Association (NMSRA). They were originally submitted on 8th March 2023 as a PDF portfolio. However, this was not the most readable format, so the comments are collated here for ease of reading. This file thus simply re-states the original representations made by the NMSRA.

Key point:

The NMSRA is especially concerned about more housing being proposed for New Marston, without corresponding investment in local infrastructure. The designation of New Marston as a 'local centre' is not matched by the reality of its limited facilities. Indeed, the only significant collection of local shops – the shops on Oxford Road (Post Office, pharmacy and Co-op food shop) - have not even been included in this 'local centre' designation

Chapter 1, INTRODUCTION AND STRATEGY

This is regarded as sound overall.

Chapter 2, A HEALTY INCLUSIVE CITY TO LIVE IN

Policy H1 HOUSING REQUIREMENT

This is regarded as sound

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

pp.10-13 CREATING MIXED AND BALANCED COMMUNITIES, and Policy H8 LOCATION OF NEW STUDENT ACCOMMODATION

Both are sound.

But where 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.

Chapter 3, A FAIR AND PROSPEROUS CITY WITH A GLOBALLY IMPORTANT ROLE IN LEARNING, KNOWLEDGE AND INNOVATION

This is overall sound.

However, care needs to be taken that the concentration on Oxford's globally important role does not inadvertently damage the wider aspects of life within a crowded city, such as the loss of entertainment venues and shops, particularly such shops – specialising in supplying white-goods, electronic goods, furniture, building and DIY materials, car-and-bike accessories - as are currently only to be found within the city on the Botley Road. A greater sense of balance is required, recognising the needs of the community as a whole, and not requiring journeys to be made outside the city to supply basic needs.

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

This is sound.

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

Unsound.

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 flooding problems and foul sewage will continue to cause ecological damage to New Marston Meadows SSSI, if this is not addressed.

Chapter 6 A CITY THAT RESPECTS ITS HERITAGE & FOSTERS DESIGN OF THE HIGHEST QUALITY

p.9 Policy HD4: NON DESIGNATED HERITAGE ASSETS

The overall policy is sound.

The 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 below.

Chapter 7 A LIVABLE CITY WITH STRONG COMMUNITIES AND OPPORTUNITIES FOR ALL

Unsound.

While the policy is sound overall, it is unsound and not effective with reference to New Marston, a local centre with over 7,300 residents. The plan refers to the importance for communities to be supported by the provision of health and community facilities, meeting places and other venues for religious/educational use. New Marston has extremely limited facilities, comprising a pharmacy and some local shops. There is no health centre in New Marston, no supermarket and no leisure or community facilities. With more housing proposed for the area, this will mean residents being unable to access opportunities within a 15/20 minute walk, as is envisaged in a liveable city. While such facilities exist in Summertown these can only be accessed by residents in New Marston taking two buses, by car travelling through one of the five new bus gates recently installed or by bicycle for those who are able to do so (New Marston has an ageing population).

It is unsound that the Policies Map does not designate the Old Marston Road shops – which include New Marston's only pharmacy and post-office – as part of the New Marston local centre.

Policies C6 TRANSPORT ASSESSMENTS, TRAVEL PLANS AND SERVICE AND DELIVERY PLANS and C8 MOTOR VEHICLE PARKING DESIGN STANDARDS

Unsound, not effective.

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 service the train station or the local district centre of Headington; to reach these requires changing bus with the consequent delays. Nor does it service the doctors' surgeries and dentists in Summertown. The X3 is often delayed by traffic between Abingdon and the Marston Road. It can be crowded with the mixed use of residents and students, especially when used by summer school students. It is inadequate for the needs of the community, and will need to be augmented to provide for any and all of the three proposed developments in the Marston Road.

C6: Transport assessments need also to 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 2 an hour should not be regarded as frequent within a city.

Chapter 8 INFRASTRUCTURE AND NEW DEVELOPMENT

Policy SPE3: Government Buildings and Harcourt House, Policy SPE6: Land surrounding St Clement's Church, Policy SPE11: Oxford Brookes Marston Road Campus

Unsound

These three sites are in Marston Road, within about two-thirds of a mile of each other, and within the Marston Road and Old Road Area of Focus.

While development of these three sites has been long foreshadowed and are not individually unacceptable, there are generic and specific points that need to be flagged.

- The cumulative impact of 160 additional dwellings (or if delivered as students rooms, the equivalent number of rooms when the relevant ratio is applied) needs to be recognised in the provision of infrastructure. This includes additional traffic using the Marston Road and accessing it by way of the new road junctions required, the additional demand for an already inadequate bus service, and additional demand for local services such as local shops, pharmacies, doctors and dentists. As is well known, the local centre of New Marston has one pharmacy and no doctors' surgeries or dentists and no direct bus services to such facilities. The development of three sites without the appropriate infrastructure is regarded as unsound.

- All three sites are stated in the plan to impact the New Marston Meadows. While each application addresses the measures to be taken to mitigate harm to this SSSI, again the cumulative impact needs to be considered when addressing the measures to be taken for each site. The measures taken for one site, particularly lower down the hill, will need to take into account the potential impact of the developments higher up the hill, whether or not plans for those other site have been submitted or work commenced. Without such measures, the developments are considered unsound.

- The repeated flooding in heavy rain from the sewer in Ferry Road shows that the infrastructure in this area is inadequate. The impact of 160 or equivalent additional dwellings can be expected to put more pressure on this infrastructure. Again, the

cumulative impact needs to be addressed, and without that, the developments are considered unsound.

- An unknown factor is what Oxford Brookes University (OBU) intends to do in respect of the further development of the Clive Booth Student Village. This further needs to be included in the assessment of the infrastructure required to support the planned level of development in the Marston Road; without that, the developments are considered unsound. Any further development by OBU should also ensure that the Headington Hill Conservation Area (which includes important green infrastructure) is not adversely impacted, as happened with the demolition in 2022 of former student accommodation and felling of many mature trees to make way for the construction of new blocks.

- Each site has reasonable stated requirements for planning and landscaping, and there is welcome desire to open-up frontage of the Marston Road while preserving its character. While each site is likely to be approved separately, there is a need for the three sites to conform to the character of the area described in the draft plan, and to provide a coherent – though not uniform – frontage to the Marston Road.

Policy SPE3: Government Buildings and Harcourt House

Taken individually, sound, but the points above on cumulative impact apply.

Policy SPE6: Land surrounding St Clement's Church

Taken individually, overall probably sound.

However

- Part of the site is stated to be in Flood Zone 3a. Developments in such areas are to be avoided and the flood risks in this area seem likely to worsen with climate change and potentially due to the other developments in this area; reading the comments about the flooding in the plan increases unease about what is proposed.
- Care needs to be taken to avoid light-spill onto St Clement's Church at night; the illuminated church surrounded by dark woodland is a night-time feature of the Marston Road.
- Care should also be taken to minimise any adverse impact on the ecology of the river Cherwell (part of the city's blue and green infrastructure) given that the land has a significant frontage on to the river Cherwell.
- Care also needs to be taken to avoid any negative impact on the 'Spires View' from South Parks.
- The points above on cumulative impact apply; the road junction for the development will be at a particularly difficult and congested point in the busy Marston Road.

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 buildings are recognised as an Oxford Heritage Asset, and the retention of the building as a significant historic feature of the Marston Road is regarded as essential. However, demolition is envisaged as a possibility in the plan, and this is not considered acceptable. The plan as written is therefore regarded as unsound.

- The retention the Milham Ford Nature Park and the protection of its status as a Local Wildlife Site is welcomed, and is indeed essential; 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.
- As is stated in the plan, the internal quad formed within the Milham Ford School grounds is designated as a Local Wildlife Site, and the preservation of this wildlife site is also essential. There is a suggestion that the land within the internal quad might be preserved as a Local Wildlife Site if the former School and the quad itself were to be demolished around it. Although that would be better than nothing, it raises the question as to whether the wildlife habitat formed by the quad would survive the quad's demolition; that seems an unsound assumption.