



The countryside charity  
Oxfordshire

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Dear Planning Team,

## **Re: Oxford Local Plan 2042 reg 18 Preferred Options consultation – CPRE Oxfordshire response**

CPRE Oxfordshire welcome the opportunity to respond to this consultation.

We attach a further document, (Oxford City LP\_CPRE Oxfordshire\_FINAL.pdf) , which provides our detailed comments by section and policy number.

In addition, we make the following key comments:

### **The Plan requires a full revision on the approach to Local Green spaces**

CPRE consider the Plan has many inadequacies in this area and seek a full review, especially Policy G1. Key issues are :

- This consultation fails to identify or map a network of Oxford's green blue infrastructure. This is a significant omission which affects the validity of the consultation and which cannot be justified given the existence of the longstanding Green Infrastructure Report (2022) and the availability of the results of the Local Nature Recovery Strategy consultation responses report (January 2025) and liaison with the LNRN.
- We consider the Plan has inadequacies in the definition of Local Green Space. Whilst the Plan states that "We are protecting our important green spaces and features.", there is no definition of "important". CPRE Oxfordshire call for **ALL** Green spaces to be protected, including recreational areas. There should be no hierarchy and ALL green space **MUST** be protected.
- The Oxfordshire Local Nature Recovery Strategy (LNRS) findings and guidance must be incorporated into this Plan. A further stage of consultation would allow for its guidance and recommendations to be included and this would be our preferred option. Failing this, clear wording that the Plan will follow LNRS guidance when it emerges should be included in this Plan.
- We call for an interim consultation which maps Oxford Green Blue Infrastructure and includes findings from the LNRS must be undertaken prior to any Reg 19 consultation.



### More detail is needed to comment constructively on housing

This draft document does not contain the overall and site-specific detailed housing numbers required to positively and constructively comment. Opportunity must be provided to comment on this to meet the duty to cooperate both with other district councils and the public. An additional consultation stage is necessary to ensure that comments in this area are fully considered.

### Wording within this Plan must be tightened to ensure that intent translates to results.

We are supportive of many elements of this Plan; however, we are concerned that in several areas wording is not clear and strong enough to ensure that these intentions translate into deliverable results. We do not consider the word “**should**” used in many places to be as strong as the word “**require**”. We seek a review of wording throughout the Plan and use of clear unambiguous words like “**must, require, include or exclude**”, rather than the “should, expect to, and where possible or viable” which we see in many sections.

### Unambiguous Grampian conditions

We recognise and support the steps taken in this Plan to ensure infrastructure and service provision prior to any new development. The wording must be stronger in this area. New development **MUST NOT** be occupied in advance of agreed service and infrastructure provision.

### The consultation process

This consultation process has been poorly promoted and, as such, we expect feedback to be slim despite the keen interest in this area. Details of consultation events were not prominently displayed on the website and needed to be searched for using links. There was no consultation event in Headington, an area heavily impacted by development plans. Online events were so poorly promoted that the first two events were only attended by CPRE representatives, with the third having only three attendees, one of whom is a CPRE member.

**It is not acceptable for this Plan to move directly to a Reg 19 consultation later this year**, where detailed comment on content is not permissible. The points we raise above must be addressed and further opportunity for consultation provided. West Oxfordshire District Council are at the same stage on their Local Plan and plan a Preferred Spatial Options consultation later this year and we urge Oxford City to implement a similar approach.

We are happy to discuss any aspect of our response in person with you should this be helpful.

Yours faithfully,

Lynda Moore

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