

Oxford City Local Plan consultation response

Section	Policy	CPRE Oxfordshire Comments
2. A healthy Inclusive city to live	HP1 Housing Policy	<p>CPRE support the revised methodology used to ascertain a lower housing need from that identified in the previous Local Plan. We seek an emphasis on all housing need to be provided within the City boundaries, making best use of existing allocated sites, and particularly support the emphasis and policy on existing allocated employment sites reverting to housing.</p> <p>We seek clarity on the unmet housing numbers (if any) which the city council will be seeking to be met by its neighbouring districts and understand that work in being undertaken in this area. We seek all efforts to be made that any such unmet need can be accommodated on existing allocated sites, using higher densities and good design. We will strongly oppose any proposal for unmet housing need to be met in the Oxford Green Belt or in the open countryside generally.</p> <p>CPRE Oxford City seek further interim consultation when detailed housing numbers are available . It is not possible to comment constructively without sight of the overall and detailed site specific housing numbers. It is vital that a further interim stage of consultation is undertaken when housing numbers become available in order that the City meets its duty to cooperate with neighbouring districts and democratic consultation can be incorporated.</p> <p>It is not acceptable that there will be no sight of the detailed housing numbers until the Reg 19 stage, when comment can only be given on legal and compliance grounds.</p> <p>Therefore, an interim consultation on housing numbers must be undertaken prior to Reg 19.</p>
	H2 Affordable housing	<p>CPRE Oxford City support the emphasis to be placed on social rented accommodation. We acknowledge and support the findings of the Plan, that homes must be genuinely affordable in the City. CPRE advocate for a local average wage multiplier to be used to assess affordability.</p> <p>Whilst supporting the intent of Policy H2, the wording must be altered and strengthened to ensure it delivers results. Developers often cite viability as a means to replace social rent homes with other “ affordable “ options and this must be prevented.</p> <p>It is CPRE Oxfordshire’s view that sites which are not viable for social housing for rent should not be considered.</p> <p>No viability exceptions should be allowed and we propose the following wording changes on Policy H2, section b) :</p>

		b) At least 80% (provisional requirement, subject to further viability testing) of the affordable units on the site should must be provided as onsite Social Rented dwellings. The remaining element of the affordable housing may be provided as intermediate forms of housing onsite provided that they are affordable in the Oxford market.
	H3): Affordable housing: financial contributions from new student accommodation	<p>CPRE support alternative option 1 rather than the Preferred option.</p> <p>All initiatives to fund further affordable housing should be pursued. The draft plan itself states that many sites for student accommodation could equally be suitable for non-student homes. The plan also makes it clear that contributions will not be required from either proposals within existing or proposed university or college campus sites OR renovations of existing sites. i.e. they will only be required from units creating a net gain. Although the plan voices a concern in that “any contributions should not disadvantage the delivery of sites,” the delivery of new sites should not be at the expense of housing for Oxford residents. Any funds raised could contribute towards buying back existing family housing currently used to house students.</p>
	draft policy H4): Affordable housing: financial contributions from self-contained older-persons accommodation.	<p>CPRE support alternative option 1 rather than the Preferred option.</p> <p>All initiatives to fund further affordable housing should be pursued.</p>
	policy H5): Affordable housing: financial contributions from new commercial development.	CPRE support the preferred option. However, option 2, the onsite provision of affordable housing within commercial development should not be discouraged as a result of this and either the preferred option or Alternative Option 2 should be a requirement.
	policy H7): Mix of dwelling sizes (number of bedrooms).	CPRE are supportive of the mix of dwellings but are concerned that on recent housing developments the social rent / affordable element is mostly made up of one or two bedroomed flats often located in blocks adjacent to main roads. Since the lack of housing for those in need is one of the main drivers for allowing development in the first place a minimum floor area should be set for the social/ affordable element as a condition for planning permission rather than only the number of units.
	draft policy H8): Loss of dwellings.	This policy should include the encouragement of community land trusts
	H11): Ensuring there is enough student accommodation to meet needs.	Support preferred option. The plan makes it clear that there is a balance between the economic and educational role of the Universities and other educational institutions and the impact that a large number of students resident in Oxford has on the availability of general market and affordable housing. It acknowledges that the demand for student accommodation increases pressure on the housing stock, both availability and price. But the measure for dealing with this involves the setting of thresholds. Although these thresholds are to minimise the number of students who are reliant on living outside of

		<p>university-provided accommodation “so that this housing can be retained for market and affordable housing which is a priority for this Plan”, the aim is to set the thresholds at a level which is realistic for each institution. Yet the draft policy makes it clear that it will permit new, redeveloped or refurbished academic, research or administrative facilities, if it can be demonstrated that any increase in students resulting from improved academic facilities will be matched by increased accommodation provision.” It is not at all clear how these thresholds will be set; whether the aim is to allow continued expansion of the university or solve the housing problem.</p>
	policy H14): Older Persons and Other Specialist Accommodation.	CPRE support the preferred option
	H15): Self-build and custom house building.	<p>CPRE support the Preferred option and particularly support a defined timeframe where any undeveloped plot(s) are then released for general housing development.</p> <p>We seek assurance that such self-build and custom housing is bound by the same policies as other development and specific mention that Policy G1 and G4 apply.</p>
3. A prosperous city with a globally important role in learning, knowledge and innovation	draft policy E1): Addressing Employment Land Needs.	<p>This policy has been substantially altered from that in the present Local Plan. The previous policy had different categories of protection for employment sites making it easier to develop category 3 sites, for example. The proposed policies involving housing makes developing what were category 3 sites, under c) to -g), the balanced judgment test, is as difficult and uncertain as developing housing on a Key Employment site. The problem in this regard becomes even more acute when there is no list of the many non-designated employment sites available and some Key Employment sites (supposedly protected) are already scheduled for housing or other residential use, such as at Osney Mead Industrial Estate (44 acres). The redevelopment of a small redundant shop for housing should not be subject to the same level of scrutiny as a plan to build a large number of houses on a large employment site and is a waste of planning resources.</p> <p>CPRE have repeatedly called for some development on various sites listed as Key Employment Sites many of which have sat empty for decades. The worst examples, being the Osney Industrial Estate and the Unipart site but there are many others. For example, there are still empty sites available on the old British Leyland site at ARC Oxford dating from the 1990's and representing now 30 years of being effectively Brownfield sites. If there is no real expectation that these sites will be actively developed then protecting them as Employment sites makes no sense. The City Council have singularly failed to deal with this issue claiming quite wrongly that Oxford is full. ignoring Osney Mead and the many other vacant sites in Oxford.</p> <p>In CPRE's view the draft Policy should state that :</p> <p><i>“if a site or part thereof has not been used for substantive employment purposes for a period of 10 years or more then it shall not be subject to the Proposals involving housing listed in the Employment strategy and be subject to normal planning requirements for housing development. Car or commercial vehicle storage/ parking would not be regarded as substantive employment. In relation to smaller developments (formerly Category 3 sites) the suggested proposals should not apply.”</i></p> <p>Further owners should pay enhanced business rates if they fail to redevelop vacant sites.</p>
	draft policy E1): Making the best use of employment sites.	Refer to comment on E1 above

	draft policy E1): Housing on Employment Sites.	Refer to comment on E1 above
	E1): Location of New Employment Uses.	Refer to comment on E1 above
	draft policy E2): Warehousing and Storage Uses.	CPRE support an exemption for freight consolidation if the aim of this is specifically to decrease the number of delivery journeys required by road. We support for loss of B8 uses, but the word “ generally ” must be deleted in order to make this policy possible to apply in practise. Specifying support for new B8 uses if required to support locally recognised employment sites is a useful clarification we support, but declaring support for B8 sites that support the <i>national economy</i> once again removes clarity and undermines the aim to intensify employment sites and decrease the total number of B8 sites in Oxford.
	draft policy E5): New Tourism and Short Stay Accommodation.	Need tighter wording in the policy from must to would
	draft policy E5): Existing Tourism and Short Stay Accommodation	Whilst CPRE support the intent of this policy the provision of homes should always be prioritised over short stay accommodation, such as hotels, and this should be stated in policy.
4. A green, biodiverse city that is resilient to climate change	draft policy G1): Green Infrastructure Network and Features.	<p>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 <u>Green Infrastructure Report (2022)</u> and the availability of the results of the <u>Local Nature Recovery Strategy consultation responses report (January 2025)</u> and liaison with the LNRN.</p> <p>An interim consultation which maps Oxford Green Blue Infrastructure and includes findings from the LNRS must be undertaken prior to any Reg 19 consultation.</p> <p>Oxford’s green space network should encompass and connect all of the existing green - blue infrastructure in the city and identify sites where new genuine brownfield development can connect with this network. In addition, Oxford’s nature network should connect with green infrastructure beyond the city boundaries.</p> <p>This policy should include the Oxford Earth Academy work on the Oxford Education Nature Park.</p> <p>There should be a presumption against any loss of trees, hedgerows and woodland. No losses should only occur except in truly exceptional circumstances e.g.: safety</p> <p>All Green space should be protected; there should be no hierarchy.</p> <p>Notwithstanding our call for this whole policy to be reviewed and maps provided, CPRE comment more specifically :</p>

		<p>Alternative option 1 is confusing. Green spaces are covered by the NPPF golden rules (s.156-7). These don't mention re-provision. S.104 which does mention re-provision, but only refers to existing open space, sports and recreational buildings and land, including playing fields and formal play spaces. It doesn't refer to green spaces.</p> <p>Focusing on resilience to climate change means you compromise the policy on recreation spaces. The draft plan states, "limited opportunities to provide new space means that loss of existing green features needs to be carefully considered and resisted wherever necessary." This is really vague. The 2036 plan re-states the NPPF requirements regarding recreation grounds, but in this draft for the 2042 plan you only note that "national policy includes protections for open spaces and guidance for how to assess applications that could result in their losses."</p> <p>Allocated sites proposed include 2 public recreation grounds, to which national policy should apply. In your site assessment for the Sandy Lane, you state that this site is within one of the 30% most deprived areas in the country but interpret this to mean that building social housing (which will reduce access to recreation facilities) will help reduce health inequalities. For Bertie Place recreation ground your equalities impact assessment states that the social profile of the electoral ward indicates a need for social housing, and that this outweighs the downgrading of recreational amenity. This is not what national policy says. The NPPF says that both recreation grounds and social housing are important. Deprived areas need recreation grounds.</p> <p>The preferred option requires identification/designation of green and blue infrastructure sites for protection. You suggest a hierarchy of protection for spaces within the Green Infrastructure network of green spaces, in which ecological function takes priority over recreational/health functions. In the last GI study, Bertie Park was cited as an example of a small, but multi-functional site. In spite of the fact that it is a highly valued community space, it would be at the bottom of the hierarchy. You state that planning permission will only be granted for proposals relating to sites at the bottom of the hierarchy "where any impacts are mitigated by ensuring sufficient re-provision, ideally onsite, and to the same standard or higher, or if it can be demonstrated in the application that current provision is surplus to requirements." There is no detail on how you determine whether a site is "surplus to requirements".</p> <p>Draft policy "would seek to protect all public and private green infrastructure in the city from inappropriate development and ensure that, where it comes forward, development mitigates any potential impacts." "Seek" means that you are not necessarily going to protect GI, and if it comes forward for development, instead of replacing recreation spaces with equivalent or better, you make clear your intent to "mitigate any potential impacts." The following statement is even worse: "the draft policy also sets out conditions by which certain types of green space may be lost to other forms of development, however, there may also be additional considerations which would apply to applications that affect certain types of spaces including how these might need to be re-provided." You claim to clarify this in section 4.2 where you actually make clear your intention to depart from national guidance with reference to Parks and gardens, accessible greenspace and amenity greenspaces: "Where relevant, applicants will have to demonstrate consideration of how any loss can be mitigated, especially if this is located in an area which already suffers from a deficit." How would OCC determine whether a mitigation</p>
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	draft policy G2): Enhancement and provision of new green infrastructure features.	Specific quality standards should be adopted as referred to in Alternative Option 1
	G3): Urban Greening Factor.	<p>UGF should be mandatory across all sites and CPRE support Alternative option 1.</p> <p>There should be specific requirements for trees to be planted in all developments for cooling, noise filtering and air quality purposes</p>
	draft policy G4): Delivering Mandatory Net Gains in Biodiversity	<p>CPRE support Alternative option 1, that a BNG higher than 10% should be adopted across all sites given the margins of error and loss / reduction of new planting due to stress from climate change.</p> <p>The Local Nature Recovery Strategy (LNRS) has yet to be published, and this should be acknowledged within the Plan.</p> <p>A further stage of consultation should be undertaken to include LNRS guidance. Failing this, it should be stated that this Plan will adhere to guidance from the LNRS when available.</p> <p>All green spaces should be protected and there should not be a hierarchy.</p>
	draft policy G5): Protecting and enhancing onsite biodiversity.	<p>CPRE supports this policy and welcomes its aim to enhance biodiversity, particularly where Biodiversity Net Gain (BNG) is delivered off-site. However, we recommend that on-site biodiversity enhancements be made mandatory for all developments, regardless of whether BNG has been delivered on-site or not.</p> <p>We also propose that the wording in the following sentence be strengthened by replacing "<i>should seek to</i>" with "<i>must</i>":</p> <p>“All extensions and new-build development must incorporate ecological enhancements into landscaping or building facades/roof spaces, tailored to the priority habitats and protected species present within the site and surrounding area.”</p> <p>Regarding the sentence:</p> <p>“Seeking advice from a suitably qualified ecologist on the ecological enhancements selected is encouraged,”</p> <p>we suggest clarifying that such advice is required only for minor and major developments. Requiring this for household extensions could create unnecessary barriers for homeowners.</p>

		Lastly, we welcome the Council's Ecological Points List and are pleased it will remain a live document. The flexibility to add new opportunities for specific features in the future is a positive approach.
	draft policy G6): Protecting Oxford's ecological network.	<p>Wording needs to be strengthened so that policy should “ require “, rather than ‘<i>seek to ensure</i>’.</p> <p>All of Oxford's remaining green spaces should be protected with a requirement to improve their quality, access, connectivity and number.</p>
	policy G7): Flood Risk and Flood Risk Assessments.	Requirements not expectations for FR to be assessed etc. in view of climate change. No development on any FR3b or FR3a sites. The alternative option would be no exemptions for allocated greenfield sites (policy contradictions)
	draft policy G8): Sustainable Drainage Systems (SuDS).	<p>We support the preferred option but object discharging to a combined sewer under any (even exceptional) circumstances. Should this not be feasible at the design stage the development should not be permitted.</p> <p>We suggest wording changes of the ‘Not feasible’ clause should be removed. It should ‘Require’ – rather than ‘guidance’ or ‘expect’ as in the current draft plan</p> <p>Can there be greater clarity of the volume of rain water they can expect to be stored on site.</p> <p>We would also like you to take onboard CPRE comments from R5.</p>
	draft policy G9): Resilient design and construction.	CPRE support the bespoke policy for Lea Valley.
	008b (draft policy R2): Embodied Carbon.	It is possible to carbon cost the Local Plan as it develops and site details develop?
	(draft policy R3): Retrofitting existing buildings including heritage assets.	CPRE support the Preferred option , especially the emphasis on a “whole building” approach.
	(draft policy R5): Water Quality and Resources.	<p>The policy which seeks to make it a requirement that foul and surface water are kept separate on all new developments is to be welcomed.</p> <p>However, the problem of sewage in our rivers and streams continues to get worse rather than improve and urgent action is required to resolve the problem as it has become a public health issue.</p> <p>The City Council as the appropriate planning authority should be requiring details for all new development as to their impact on existing waste water disposal in particular the impact on the treatment plant at Sandford which is supposed to be upgraded. The situation regarding the upgrade at this plant remains uncertain with Thames Water seemingly in deep</p>

		<p>financial difficulty and OFWAT likely to be replaced with another authority. If it is apparent that the improvement works will not be proceeding at the rate planned and this is likely to only worsen the discharge of raw sewage, accordingly any planning permission should be conditional on those improvement works having been substantially completed. The wording of Policy R5 as it stands is only likely to worsen an existing problem. The Council seems wrongly to consider that cleaning up Oxford's rivers and water courses is none of their responsibility and they can continue to blame others for the mess we are now in.</p> <p>It is not understood why the Plan requires only a Foul and Surface water drainage strategy for new build residential development of 100 dwellings or more. The problem of foul water discharge is here and now and much smaller developments will have an impact on a heavily overused sewage system. The limit should be set much lower at 10 dwellings or more.</p> <p>The role of the local planning authority in relation to the discharge of sewage is set out in the case of Barratt Homes Limited vs Dwr Cymru Cyfyngedig (Welsh Water) see Para. 44 of the judgment. The Policy should set out that each planning application should be dealt with on its merits so far as the issue of likely discharge of foul water is concerned, for example, if new student accommodation is being planned.</p> <p>Similarly, all new planning applications must address the issue of water shortages which is clearly going to be a real problem during the time line of the draft plan.</p> <p>In relation to the improvements at Sandford Treatment works the stages reached in the promised improvement works there should be monitored by the Council and the results obtained made available for public inspection as part of the suggested Policy. We refer to Windrush Against Sewage Pollution who will closely monitor the situation in this regard</p>
	draft policy R7): Contaminated Land.	<p>It is concerning, given the extent of contamination in Oxford, that the council quotes the NPPF determination "that after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990." The draft plan states that responsibility for securing a safe development rests with the developer and/or landowner. There are two problems with this:</p> <ol style="list-style-type: none"> 1. If the land is no longer determined as contaminated, there may be no record of the remediation measures taken to decontaminate the land. This could mean that a developer could decide to e.g. excavate a layer of soil used to remediate a site, therefore exposing the problem (as has been proposed in plans for developing Bertie Park!) 2. Saying that the responsibility for securing a safe development rests with the developer does not specify a role for the local authority who may or may not have a record of the previous contamination and its remediation and the developer who has responsibility for securing a safe development. <p>The council should have access to a record of contamination and remediation measures for previously contaminated land.</p>

		Adjacent land should also be referenced and considered.
	(draft policy R8): Amenity and environmental health impacts of development.	CPRE Oxfordshire support the intent of this policy. We point the City council to the wording in the Joint South and Vale Local Plan and ask for consideration of this wording in this Plan <i>“protect landscape character, dark skies and the natural beauty of the countryside in development decisions”</i>
6. A city of culture that respects its heritage and fosters design of the highest quality	HD1, HD2, HD3, HD4): Designated Heritage Assets	CPRE Oxfordshire strongly support a policy which identifies and protects “Oxford specific” heritage. Views both <ul style="list-style-type: none"> • outwards from the City and • inwards from the surrounding countryside of the world famous “Oxford Spires”, must be protected.
	(draft policy HD6): Archaeology.	CPRE support policy to “proactively” map areas of known archaeological interest. We support the general intent to not allow development unless harm is removed, although feel the wording of the sentence in relation to mitigation is unclear and ask for this wording to be revisited: <i>“mitigated to an appropriate level, conserving the remains and the significance of the archaeological or paleoenvironmental asset better revealed and understanding of that significance enhanced (by agreed measures).”</i>
	draft policy HD10): Health Impact Assessments.	The inclusion of a health impact assessment sounds great, but it should be made clear not just what should be included in an HIA, but how the information is to be used. Oxford is very short of space. If HIAs are to be used e.g. to push through developments which conflict with national policy in disadvantaged or working-class areas, then this is not a good thing. These can be huge documents. If they increase the volume of paper that councillors and residents have to plough through, it is important to clarify both their scope and their role.
	Draft Policy HD11): Privacy, Daylight and Sunlight	This policy should address dual aspect to provide shade. We consider a problem here is the insistence on little bits of garden for individual houses means that the quality of space is inevitably really limited. A greater emphasis on community living and shared spaces would enable a greater density with a much better quality of life. This is another reason to encourage the greater involvement of community land trusts.
	draft policy HD13): Outdoor Amenity Space.	CPRE support this policy and seek that communal food growing space is specifically encouraged within this policy.

	draft policy I1): Digital Infrastructure to support new development.	All new data centres should be required to provide details of likely water and electricity requirements. It is confusing that in relation to R5 that there is a limit on domestic water use but that in relation to data centres which use large volumes of water for coolant purposes no restriction is applied to them as part of the planning process. Similar considerations apply to electricity supply where the grid is unable to satisfy demand at certain critical periods.
10. Site Allocations	Oxford Local Plan 2042 Regulation 18 (Preferred Options) Consultation - 10. Site Allocations - Oxford City Council - Citizen Space	<p>At an overall level CPRE object to construction on recreational space , which should be considered as a Green space (Sandy Lane and Bertie Park)</p> <p>Site specific comments :</p> <p>Site name Unipart HELAA reference 120 The policy SP 8 reserving this site solely for employment use was written in 2016 and since then nothing has changed in any meaningful way - most of the site is either used for vehicle parking or open-air storage. It has been like that since the Pressed Steel Plant closed 40 years ago. It represents a failure to redevelop what is effectively a Brownfield site and a large one. The Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.</p> <p>Site name ARC Oxford SHLAA 587 Although some of this site has been built on there are areas which remain vacant and has done so since the 1990's when the old Rover factory was demolished. The rate of new build has slowed down completely and the vacant sites are very much as they were in 2016 when Policy SP10 was written. The Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.</p> <p>Site name Kassam Stadium and Ozone Leisure Park SHLAA reference 028A and 028C The policy SP14 was written before the proposed move by Oxford United Football Club to the Triangle at Kidlington. The move is very much at the planning stage and clearly there should be no consideration of any redevelopment of the Kassam Football stadium until the necessary planning permissions are in place and construction started as well as the required infrastructure such as foul water sewage and water supplies being ready. Policy SP14 needs updating to take this into account.</p> <p>Site name Government Buildings and Harcourt House SHLAA reference 024 It is noteworthy that this site has remained vacant for a very long time and that the Policy SP16 was prepared in 2016 so 9 years ago and the site had been vacant for at least 10 years before that. This is an attractive spot in a prosperous part of the City there is absolutely no reason why it could not have been redeveloped years ago and yet the Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment.</p>

