



planningpolicy@oxford.gov.uk

4 January 2024

Dear Planning Team,

**Oxford Local Plan 2040 Reg 19 consultation – CPRE Oxfordshire Response**

CPRE Oxfordshire welcome the opportunity to respond to this consultation as follows:

- A completed Form A, where we indicate our wish to be updated on all aspects of the Plan as it progresses and speak at examiners meeting.
- Completed Form Bs, where we challenge the soundness of certain policies and paragraphs, as shown in the table below:

Policy/ Para number	Description	Primary area of challenge- Further detail provided in form
Para 1.2	Renewables. We also attach a further document in support of this Form B.	Contrary to NPPF policy the plan fails to identify energy reductions achieved through direct action within the boundaries of the city. The Local Plan needs a robust brownfield first approach to renewable energy that includes a spatial strategy maximising the potential for renewable energy within the city on industrial sites, shopping centres, car parks and even the city’s road network.
Para 4.8	Green Belt	NPPF para 1454 states that Plans should positively enhance the benefits of the Green Belt. This plan has no specific Green Belt policy and only a glancing reference within Para 4.8 which says (at the end) - "Where applications are proposed within green belt, these will be determined in accordance with national policy."  This is a staggering downplaying of the importance of the Green Belt in guiding the spatial evolution of the City and protecting its historic character and setting.



Policy E1	Employment Land	This policy is too restrictive and puts unnecessary barriers in the way of employment sites which have laid vacant for decades being designated a change of use for residential purposes, instead forcing development on the Green Belt. Policy E1 (e),(f),(g) and (j) are not needed and should be removed.
Policy G4	Biodiversity Net Gain	The Oxfordshire Local Nature Partnership (OLNP), of which Oxford City Council is a member, has developed a full evidence base and rationale for Local Planning Authorities to justify more than the mandatory 10% BNG. By not pursuing the findings of this report this Plan is in breach of NPPF Para 179b which states that Plans 'should identify and pursue opportunities for securing measurable net gains for biodiversity.'
H1	Housing Requirement	The HENA report on which this is based is unsound. CPRE Oxfordshire strongly support the findings of the Independent Review of the Oxfordshire Housing and Economic Needs Assessment prepared for Cherwell District and Oxford City Councils -Report of Findings for South Oxfordshire and Vale of White Horse Councils and presented as Appendix 2 in the response from South Oxfordshire and Vale of White Horse councils. This report concluded :  "the standard method calculation identifies the Local Housing Need mandated by Government for every local authority area. Based upon the demographic and employment data for Oxford City and Cherwell (and the rest of Oxfordshire) the HENA 2022 does not provide any justification for using an alternative approach or different housing need figure anywhere in Oxfordshire."
H8	Housing Density	Density targets are not ambitious enough. The NPPF (Paras 124-125) is clear that efficient use of land is essential especially where there is an envisaged shortage of land to meet housing needs.  We support the submission by South Oxfordshire and Vale of White Horse District Councils that this failure to maximise density means the policy is not Positively Prepared or Effective, as it does not seek to meet the area's objectively assessed needs and undermines joint working on this cross-boundary strategic matter.
S4	Plan Viability	The provision of "a sufficient number and range of homes can be provided to meet the needs of present and future generations" must not be prioritised over "fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities'



		health, social and cultural well-being." These two factors must be judged and assessed on an equal basis.
SPS1	Arc Site	Proposed Policy E 1 should not apply to this site, allowing it to be developed in accordance with standard planning requirements for residential development.
SPS2	Kassam Site	Policy SPS 2 should be deleted from the Local Plan and the Council should support the retention of the Kassam Stadium and associated leisure facilities.
SPS3	Unipart Site	Some parts of this very large site should either be placed in Category 3 employment sites land or as Brownfield. These areas of land need to be redeveloped and are suitable for other uses than just employment.

In addition to the above paragraphs and policies we challenge we also wish to express our support for Policy R1 -Net zero carbon development. We consider this policy to be beneficial, sound and similar to that of Greater Cambridge , South and Vale and the currently challenged proposed policy at Salt Cross Garden Village. If contested, CPRE Oxfordshire would welcome the opportunity to speak in favour of this policy.

Do contact us if there is any aspect of our response you wish to discuss.

Yours faithfully,

Lynda Moore  
CPRE Oxfordshire, Planning Co-ordinator