POETS' comments on the draft Oxford Local Plan to 2042

(regulation 18 consultation July-August 2025)

1. **POETS have fundamental and long-standing concerns about the very significant imbalance between the high number of jobs in the city and the much lower number of economically active residents.** This has led to many problems including high levels of commuting into the city, traffic congestion, a shortage of housing and very high housing costs. While we welcome a more flexible approach to the use of employment sites to support housing delivery, policy E1 and Appendix 3 offer a very reluctant and highly constrained flexibility and are still too focussed on supporting continued high levels of employment. **The plan should be modified to give greater priority to providing housing**, for example, by
   - reducing the number of key employment sites listed in Appendix 3
   - making some specific site allocations for housing on all or part of land currently identified as employment sites and
   - changing the wording of policy E1 to remove the objection to a reduction in the amount of employment floorspace and the number of jobs on key employment sites.

2. **There are many elements of the draft plan that POETS support** including, in the context of a very constrained city, using the government's standard method for calculating housing need. It is also likely that policy H1 could make provision for more homes given
   - the more flexible approach to housing on some employment sites (E1)
   - the policy for employer-linked affordable housing (H6) and
   - through the assessment of all potential sites, including some sites proposed by landowners for student accommodation that do not meet the locational requirements in policy H10, the four 'areas of focus' in chapter 8, and an assessment of sites in Oxford currently designated as Green Belt.

   However, when assessing the development potential of green spaces and green belt land within the city, it's essential that the national importance of Oxford's character and landscape setting continues to be protected. In these areas opportunities should be taken to provide recreation for local people, as well as protect and enhance biodiversity.

3. While we are keen to see more homes provided in Oxford, we are concerned that permitted development rights can be used to allow the conversion of totally unsuitable buildings for housing. To ensure that new homes provided through

conversions are of a decent standard, full planning controls should apply, and the permitted development rights should be withdrawn through an article 4 direction. This intention should be flagged in the local plan.

4. We like the narrative of the three over-arching threads and support the first thread to reduce inequalities. In particular we welcome the policies
    - for affordable housing (H2) and seeking financial contributions to affordable housing from student and elderly persons accommodation (H3 and H4). We consider this should be extended to all major commercial developments (H5)
    - for employer-linked affordable housing (H6). **However**, please add that this should be provided in perpetuity
    - resisting the loss of dwellings (H8). **However**, as worded it doesn't explicitly cover the loss of a permanent home to a short term let or holiday home. This should be clarified in the policy, or put in a separate policy that should also include permanent residency requirements on all new housing granted planning permission
    - for community-led housing (H15). **However**, it would be preferable to have a separate policy as such provision can be made through conversions and on brownfield sites where flats are provided, which are precluded by this policy
    - requiring Community Employment and Procurement Plans (CEPPs) to significantly improve job opportunities for local people (E3)
    - requiring the provision of affordable workspaces on key employment sites (E4).
5. We support the second overarching thread - that of addressing climate change - by adapting to the impacts, securing net zero development (R1), reducing embodied carbon in construction (R2) retrofitting existing buildings (R3), and enabling people to live lower carbon lifestyles. We support the policies in chapter 5, including the policy for making efficient use of land (HD8) **but** consider it should be strengthened by saying that development on brownfield land will be prioritised over greenfield sites.

6. POETS support the third overarching thread - that of enabling a liveable city and ensuring that residents have access to their daily needs within an easy walking distance of their homes, and in particular policies to support the vibrancy of the city and district centres (C2). We also support policies to protect and enhance green spaces and improve biodiversity (G1-G6). The network of green and blue spaces is an essential part of the character of the city and of great benefit to local residents and wildlife. **However**, policy S3 on infrastructure in new developments could be

strengthened by saying 'Development proposals, including those allocated in this plan which give rise to a need for infrastructure improvements, will be required to mitigate their impact....'

7. **However, it is disappointing that the transport policies are not much more forward thinking**, in particular
   - the objective relating to transport (para1.6, 4th box relating to a liveable city, 4th bullet point) should be made stronger by referring to
     - 'prioritising the use of public transport and sustainable modes *over* the use of private vehicles and making sustainable travel the natural first choice' and
     - working with others to reduce congestion
   - the policy on transport assessments (C6) should be made more robust as below
     - at the end of the first sentence add 'as soon as possible as the development proceeds and measures have been taken to ensure the need to travel by car is minimised'
     - the references to pedestrian and cycle movements and public transport should be higher up the list of factors to be considered - they should be a) and b) not c) and d)
     - in existing d) after 'access to high quality public transport is facilitated' add 'and, where appropriate, funded for a specified period'
     - the policy should also refer to the provision and maintenance of car clubs
   - the policy on motor vehicle parking design standards (C8) should encourage low traffic neighbourhoods and car-free developments (as well as low car developments). There will be sites in the city and district centres where car-free developments would be appropriate: they should be encouraged in a place like Oxford with its excellent public transport, cycle lanes, bike and scooter hire schemes. The council should be proactive and identify sites for car-free development
   - the policy on electric vehicle charging points (policy C9) for new build non-residential developments seeks only 10% of parking spaces to have EV charging. Yet the current level of EV ownership is almost 17%, so this seems a very low percentage considering EV ownership levels will increase over the life of the plan.