

Policy and Programmes

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Dear Buckinghamshire Planning Policy Team

Thank you for the opportunity to comment on your Regulation 18 consultation for the Buckinghamshire Local Plan 2045 (Part A and Part B). This representation is provided from South Oxfordshire District Council.

Earlier in your plan preparation process, in June 2023, you consulted us on your survey about the draft vision and objectives. We did not submit a survey response, and we had no observations or comments to make on your draft vision and objectives. Prior to that, in January 2023, you consulted us on your Sustainability Appraisal Scoping Report. We had no concerns although we offered some suggestions for the report. We also advised you of our own Joint Local Plan progress and the importance of our Neighbourhood Plan development.

In relation to the publication of your emerging Buckinghamshire Local Plan 2045, we received no invitation to discuss any potential cross boundary issues. We therefore emailed your team on 15 October to request a meeting. Our officers subsequently met on 23 October, the discussion in that meeting has informed this representation.

Vision and objectives

We note that the vision and objectives have now been updated and are included in the draft Local Plan consultation.

Potential strategic matters

The Part A and Part B consultations indicate that the Buckinghamshire Local Plan could have the potential to generate strategic matters which could significantly impact on South Oxfordshire. We have identified six matters which have the potential to be cross boundary matters, these are set out below.

Housing

On housing need, we note that the emerging housing need in Buckinghamshire will be **95,000** based on the Government's Standard Method. You intend to include a 5% buffer of supply, and that this is all to be delivered over 20-year plan period to 2045. We can see that no decisions are presented about the location of development or about the potential capacity in your plan area, and you are awaiting the completion of a capacity assessment (Housing Land Availability Assessment), a 'new and expanded settlement study', and a Green Belt Assessment. We also note that it is not known yet if you will have unmet housing need.

We note that your housing strategy approach 7 could suggest the inclusion of development within South Oxfordshire as offsetting your own housing requirement, as part of your own housing supply (e.g. Thame or Henley on Thames are settlements close to your border but outside your District which your evidence base documents frequently mention). In the context of the above, we were not expecting to see a housing strategy option (approach 7) which assumes that housing for Buckinghamshire is best delivered outside of Buckinghamshire.

At this stage, we suggest that a significant amount of capacity will be available from approaches 1-6, and Buckinghamshire will need to explore those options before concluding that there is inevitable unmet housing need.

South Oxfordshire has an adopted Local Plan, and an emerging Joint Local Plan currently at examination. Both our adopted Local Plan and emerging Joint Local Plan make no provision for Buckinghamshire unmet housing need, because there has been no justification nor engagement about that matter.

Depending on the implementation of approach 7, we are concerned that this approach could have very significant cross boundary impacts. This is, in our view, a Duty to Cooperate matter. It is helpful that at the officers meeting of 23 October you agreed to meet with us again to explore your evidence development in January next year.

Employment

Our Districts share economic links with Buckinghamshire, including commuting flows, travel to work areas, and commercial property markets. Furthermore, our District is, alongside Buckinghamshire, part of the same Oxford to Cambridge corridor. Given these strong functional links between our local planning areas, the employment strategy is a potential strategic matter, and we would request to be engaged on the development of the employment strategy where it has impacts.

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In addition, we would like to understand if there is a balance or imbalance of housing and employment supply. This would need to factor in your housing need using the standard method, and the commitments and new need for employment land and modern economy needs (which are additional). Our commuting patterns makes it important to understand if there is going to be a reasonable balance between the provision of enough housing to account for the projected employment growth, or enough employment when using the standard method figure.

Buckinghamshire's employment catchment is defined within your [Employment and Retail Study 2025](#). The catchment is the Buckinghamshire Functional Economic Market Area (FEMA). The Study attempts to identify adjoining FEMAs, and recognises an 'Oxfordshire FEMA', however this conflicts with the FEMA definition appropriate for South Oxfordshire, which includes South Oxfordshire, Oxford City, West Oxfordshire and Vale of White Horse. We request that this FEMA area, which is evidenced by our [Employment Land Needs Assessment](#), is recognised rather than your analysis that an Oxfordshire-wide FEMA is in place here.

We note that *Lichfield's Modern Economy Study* states that the strategic planning requirements for modern economy sectors are "*in addition to the indigenous requirements for employment floorspace and land considered within the Employment Land Evidence Study*" but does not quantify this additional need. We believe that the modern economy requirement should be quantified and factored into the employment strategy and site selection process.

Infrastructure

We have a concern in relation to housing strategy approach 7 regarding infrastructure provision for transport, water, health and GP provision. Many of the settlements near to the Buckinghamshire-South Oxfordshire border rely on infrastructure services that are already at or nearing full capacity, so there may not be headroom to accommodate any additional demand generated from development focussed at the periphery of Buckinghamshire which would link to the same infrastructure as our District.

Our [Water Cycle Study Scoping Report](#) scores sites in South Oxfordshire based on the available capacity and requirement for local upgrades of infrastructure. Many of the sites in Thame, Chinnor and Henley-upon-Thames are rated amber which indicates a medium risk to the network and/or some constraints with the associated Sewage Treatment Works or Sewerage Pumping Stations.

We recognise that health catchments cross the South Oxfordshire – Buckinghamshire border. Health provision and infrastructure catchments are potentially shared strategic matters depending on decision made about your housing strategy, and we would request to be engaged on this issue if relevant.

If approach 7 is chosen it will be important to consider adjacent infrastructure evidence, particularly on wastewater infrastructure capacity and highway network capacity. We therefore consider infrastructure provision to be a potential strategic matter which we would wish to be engaged upon.

Transport

We have important road and rail connections between our areas and your baseline evidence identifies potential network capacity issues on our District. These are therefore potentially shared strategic matters with significant impacts possible on our Districts. However, we recognise that the significance of the impacts is dependent upon your chosen housing and employment strategies and policies, so we would ask to be engaged on these matters if relevant.

We note that you have completed a baseline modelling assessment of the highway network which has predicted that existing development growth in adopted plans will lead to significant increases in traffic volumes in Aylesbury and High Wycombe. During the morning peak hour, the largest increases in delays are forecast in the south of Buckinghamshire (to and from High Wycombe, Beaconsfield, Henley-on-Thames, and Marlow), while the evening peak hour is predicted to see significant journey time increases to and from Aylesbury, Wendover, Watford, and Princes Risborough. We raised at the officer meeting of the 23 October that we needed some more information about the ‘bulge areas’ outside of Buckinghamshire and what they are supposed to reflect, and how they were decided. You helpfully agreed to take that question away and that a meeting between us and Oxfordshire County Council can be facilitated to discuss this as your evidence progresses. This could be a significant strategic matter which we would wish to be engaged upon.

You also have a Bus Service Improvement Plan (BSIP) which has outlined measures to improve bus provision including the requirement for new development to enhance or create new services to meet additional demand. We support this.

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Flood risk

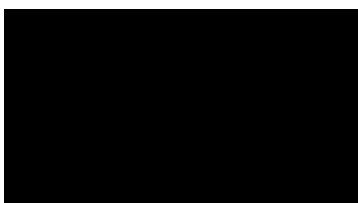
Your *Sustainability Appraisal* identifies potential flood risk to Thame arising from growth of Aylesbury as well as discussing opportunities for betterment. This is a potential strategic matter on which we would wish to engage where relevant. Like the potential transport impacts detailed above, the extent of flood risk impacts from your emerging plan is again dependent upon the decisions you make about growth strategies for housing and employment.

Green Belt

The location of the London Green Belt within Buckinghamshire is in close proximity to our District, and with the Green Belt Assessment not complete and decisions still to be made about your growth strategies, we do not rule out Green Belt being a potential strategic matter which we would ask to be engaged on if relevant.

In conclusion, the Duty to Cooperate (Planning and Compulsory Purchase Act 2004, Section 33A) defines strategic matters as those which have a significant impact on at least two planning areas. Given the proximity of settlements such as Thame and Henley-on-Thames to the Buckinghamshire boundary, your housing and employment strategies could have significant cross-boundary implications for housing supply, transport and other infrastructure provision, flood risk, wastewater capacity, and the natural environment. We request to be engaged accordingly.

Yours sincerely



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