

Policy and Programmes

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24 December 2025

Dear Cotswold District Council,

Thank you for the opportunity to comment on your Local Plan Review Preferred Options Consultation and for engaging with us prior to this stage.

This is a joint response from Vale of White Horse District Council and South Oxfordshire District Council. Both Councils are preparing a Joint Local Plan (JLP) 2041, which is currently at Examination with hearing sessions underway. At this advanced, post-submission stage, we have no scope to accommodate additional housing or employment allocations within this Plan. The stage we are at significantly limits flexibility to respond to additional unmet needs from neighbouring authorities, beyond the housing we have planned to accommodate for Oxford.

Our Shared Boundary

- Cotswold and Vale of White Horse districts share a short boundary of approximately 2 km, following the River Thames south of Lechlade.
- There are no main settlements or key infrastructure facilities along this boundary.

Given the nature of our shared boundary, we would like to emphasise the critical importance of the River Thames corridor. This area is a defining environmental and landscape asset, and its protection is essential for multiple reasons:

- **Biodiversity:** Grafton Lock Meadows SSSI lies within 300m of our shared boundary. The Thames River corridor supports rich habitats and species that require continuity and resilience;
- **Landscape Character:** The Thames contributes to rural setting, tranquillity and visual quality of the area. Plans should follow NPPF guidance to maintain and enhance networks of habitats and green infrastructure and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. We ask that you take account of valued landscapes, both designated and non-designated in Vale of White Horse, such as Faringdon and Buscot Local Landscape Designation, which abuts your boundary (see our Local Landscape Designation Review of South Oxfordshire and Vale of White Horse, September 2024 [here](#)).
- **Flood Resilience:** Development near the Thames must avoid increasing flood risk and should incorporate robust natural flood management measures.

Flood Risk and Water Quality

Development should have robust mitigation measures for both water quality and flood risk. This is particularly important given the sensitivities around Lechlade-on-Thames, where Flood Zones 3a and 3b surround the settlement. Any proposals in this area must be supported by comprehensive flood risk assessments and sustainable drainage strategies to ensure resilience and protect downstream communities.

Housing Need and Requirement

We support Plans that meet their housing need, that are evidenced by the standard method. Your consultation asks neighbouring authorities to respond to a potential request for support to meet the potential unmet housing needs of Cotswolds. We note

that you have a housing need higher than you have previously delivered, and that you have undertaken some initial generic capacity estimates. We would like to have sufficient future engagement to enable us enough time to review your detailed Housing and Employment capacity evidence as this progresses. We also suggest that you provide some robust justification for the proposed 20% discount from your capacity, which you are attributing to potentially delayed infrastructure delivery.

In terms of your potential unmet housing need, given our JLP status, it is not possible to accommodate additional housing allocations at this stage.

Housing and employment balance

As your Plan progresses, we would welcome clarification on whether cross-boundary employment flows and commuting patterns that may arise from your Plan have been fully considered. We note that the consultation acknowledges and has scoped out the commuting pattern matters that we have asked about when we met, some further work is needed to understand these dynamics in detail, especially once employment need is known.

Thank you again for consulting us on your Local Plan Review Preferred Options Consultation, and we look forward to working together to engage in the next stages of your plan.

Yours sincerely



Planning Policy Team Leader
South Oxfordshire District Council and Vale of White Horse District Council