

**SOUTH OXFORDSHIRE DISTRICT COUNCIL**

**RESPONSE TO OXFORD CITY COUNCIL'S CONSULTATION ON THE SUBMISSION  
DRAFT (REGULATION 19) OXFORD LOCAL PLAN 2045**

**SUBMITTED VIA CONSULTATION PORTAL ON 13 MARCH 2026**



Listening Learning Leading

**South Oxfordshire District Councils Response to Oxford City Council's  
(Regulation 19) Oxford Local Plan 2045 Consultation**

**CONTACT INFORMATION**

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Organisation name	South Oxfordshire District Council

<b>6. In what capacity are you responding to this consultation?</b>	
Individual/member of the public	
Charity or Community Group	
Organisation	
Local Authority	X
Councillor	
Other	

<b>7. If you are commenting on behalf of someone else, please state their name here. If you are representing more than one person or group we suggest making a separate submission for each.</b>

**DATA PROTECTION NOTICE AND NOTIFICATION OPTIONS**

<b>8. Are you happy for the first line of your address and postcode to be published with your response(s)?</b>	
I am happy for the first line of my address and postcode to be published with my response.	X
I do NOT want my address and postcode to be published with my response.	

**9. Do you wish to be notified when:**

The council submits the Oxford Local Plan 2045 to the Government	X
The Inspector's report is published	X
The Oxford Local Plan 2045 is adopted	X
None of the above	

**10. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing sessions(s)? Please note: while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.**

Yes	
No	
I am not sure	X

**11. If you wish to participate in the hearing session(s), please tell us why you consider this to be necessary. Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.**

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**POLICY S1 (SPATIAL STRATEGY AND PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT)**

<b>12. Do you consider that policy S1 is sound?</b>	
Yes	
No	X

<b>13. If you do NOT consider policy S1 to be sound, please select your reasons why from the choices below</b>	
Policy is NOT positively prepared	
Policy is NOT justified	
Policy is NOT effective	X
Policy is NOT consistent with national policy	

<b>14. Do you consider that policy S1 is legally compliant?</b>	
Yes	X
No	

<b>15. Please set out, as precisely as possible, what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above</b>
<p>Criteria e says “e) Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere”. ‘Prioritising housing elsewhere’ is quite ambiguous. Also as written this criterion could apply to all current employment sites, not just Key Employment Sites. This does not align with Policy E1 which distinguishes between the two types of employment sites, and it permits some housing on Key Employment sites. Also, we believe that a criterion for delivering housing is an omission within the policy.</p> <p>To resolve the soundness issues with Policy S1, we suggest the following modifications. Our suggestions use the terminology used in the Key Diagram and Policy E1:</p> <p>Change from “e) Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere”.</p>

To “e) Focus new employment development on Key Employment sites, redeveloping and intensifying to make best use of those sites and permit housing delivery where justified”.

Add new criteria “x) Prioritise housing across the city, redeveloping and intensifying centres and densifying the suburbs, to make best use of land”.

## POLICY S3 (INFRASTRUCTURE DELIVERY IN NEW DEVELOPMENT)

<b>20. Do you consider that policy S3 is sound?</b>	
Yes	
No	X

<b>21. If you do NOT consider policy S3 to be sound, please select your reasons why from the choices below</b>	
Policy is NOT positively prepared	
Policy is NOT justified	X
Policy is NOT effective	X
Policy is NOT consistent with national policy	

<b>22. Do you consider that policy S3 is legally compliant?</b>	
Yes	X
No	

<b>23. Please set out, as precisely as possible, what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above</b>
<p>At the Preferred Options stage we raised concerns about the lack of justification for the 1,500m buffer zone for collecting financial contributions related to the Cowley Branch Line. No new justification has been provided. The policy is also not effective because it does not state clearly that it applies within the City administrative boundary, which leads to uncertainty. To make the policy effective, the clarity contained within Policy CBLAOF (Cowley Branch Line Area of Focus) “where it falls within the city’s boundaries” should be added to Policy S3 as follows:</p> <p>“... Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city’s boundaries) will be expected in order to achieve public transport enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL.”</p>

## CHAPTER 1 (VISION AND STRATEGY)

**28. Do you wish to comment on any other part(s) of Chapter 1? Please state the relevant section or paragraph reference(s)**

Vision and Strategy, Duty to Cooperate

**29. Do you consider that the parts of Chapter 1 mentioned above are sound?**

Yes	
No	X

**30. If you do NOT consider the parts of chapter 1 mentioned above to be sound, please select your reasons why from the choices below**

Policy is NOT positively prepared	X
Policy is NOT justified	
Policy is NOT effective	
Policy is NOT consistent with national policy	

**31. Do you consider that Chapter 1 is legally compliant?**

Yes	X
No	

**32. Please set out what change(s) you consider necessary to make the stated part(s) of the chapter legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above**

The Vision to 2045 is generally positive and we share your ambitions for a healthy inclusive city, environmental improvements, and net zero carbon. However, the vision provides limited support for delivering new homes and affordable housing within the city. As a result, the protection of assets appears to be prioritised over delivery of homes.

In relation to the legal Duty to Cooperate which remains in place until 25 March 2026, we consider that the Oxford Local Plan is not currently legally compliant. A simple issue has persisted throughout the plan preparation stages, and we raised it at all formal engagement stages and at many meetings. The issue is that Oxford City Council has not identified the potential strategic matters that need to be addressed. This has created ongoing uncertainty for neighbouring authorities during engagement. However, with the forthcoming changes to the regulations from 25 March, we consider that this issue falls away. Instead, the plan will be assessed on effective joint working on strategic cross-boundary matters using the

'soundness' tests in paragraph 36(a) and 36(c) of the NPPF 2024. In relation to maintaining effective engagement, we raise no objection based on the Oxford Local Plan 2045 Regulation 19 plan proposals, and we have signed an Interim Statement of Common Ground which sets out our agreement on unmet housing needs.

## POLICY H1 (HOUSING REQUIREMENT)

<b>33. Do you consider that policy H1 is sound?</b>	
Yes	X
No	

<b>34. If you do NOT consider policy H1 to be sound, please select your reasons why from the choices below</b>	
Policy is NOT positively prepared	
Policy is NOT justified	
Policy is NOT effective	
Policy is NOT consistent with national policy	

<b>35. Do you consider that policy H1 is legally compliant?</b>	
Yes	X
No	

<b>36. Please set out, as precisely as possible, what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above</b>
<p>We commented on this policy at Preferred Options stage, and we reiterate our support for the use of the Standard Method to calculate the housing need for Oxford. We note the capacity based-housing requirement of at least 9,267 new homes.</p> <p>South and Vale firmly believe that the city should do all it can to meet local housing needs, and that the Oxford residents want housing options within the city where possible. Recent research by the Centre for Cities (Cities Outlook, January 2026 and Oxbridge blues: How have Cambridge and Oxford economies performed over the past decade, February 2026), suggests Oxford urban area is falling behind Cambridge, even though housing delivery across the wider Oxford travel to work area has kept pace. Oxford City Council's strategy has been to plan to meet all the economic growth that is anticipated, but less than half of the housing need.</p> <p>Following engagement through workshops and the Duty to Cooperate forum, it is our view that the housing capacity estimate expressed in Policy H1 (of 9,267</p>

homes) over the period from 2025-2045 is evidenced and justified, although we note that Oxford City Council has expressed a wish to update this evidence for submission. This is therefore our interim position on the capacity of Oxford city. We acknowledge that unmet need is generated because of the emerging position of Policy H1. To assist Oxford, we have an emerging Joint Local Plan which accommodates the agreed contribution to assist with meeting some of that unmet need. We look forward to preparing a Memorandum of Understanding shortly to demonstrate our shared endeavour is to deliver those homes.

We welcome the engagement on the SHLAA during the plan making stages, especially the opportunity to review site status at the February 2026 Duty to Cooperate Forum. We have no comment to make on the SHLAA at this stage, but we note that you do plan to update it before submission, so we reserve our position to comment once it is updated.

**POLICY H2 (DELIVERING AFFORDABLE HOMES)**

<b>37. Do you consider that policy H2 is sound?</b>	
Yes	
No	X

<b>38. If you do NOT consider policy H2 to be sound, please select your reasons why from the choices below</b>	
Policy is NOT positively prepared	X
Policy is NOT justified	X
Policy is NOT effective	
Policy is NOT consistent with national policy	

<b>39. Do you consider that policy H2 is legally compliant?</b>	
Yes	X
No	

<b>40. Please set out, as precisely as possible, what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above</b>
At the Preferred Options stage, we raised several concerns with the Specialist Housing Needs Assessment. The consultation statement dismisses many of our requests for data and sources. As a result, we have a number of concerns about the transparency of data sources and methodology used in the assessment which remain unresolved.

## CHAPTER 2 (A HEALTHY INCLUSIVE CITY TO LIVE IN)

**89. Do you wish to comment on any other part(s) of Chapter 2? Please state the relevant section or paragraph reference(s)**

Page 2 of the chapter

**90. Do you consider that the parts of chapter 2 mentioned above are sound?**

Yes	
No	X

**91. If you do NOT consider the parts of chapter 2 mentioned above to be sound, please select your reasons why from the choices below.**

Policy is NOT positively prepared	
Policy is NOT justified	
Policy is NOT effective	X
Policy is NOT consistent with national policy	

**92. Do you consider the parts of chapter 2 mentioned above are legally compliant?**

Yes	X
No	

**93. Please set out, as precisely as possible, what change(s) you consider necessary to make the stated part(s) of the chapter legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above**

Page 2 of this chapter includes some policy implementation bullet points. The final bullet point should be amended to reflect that the City Council and neighbouring authorities are working together to deliver housing, rather than the sites themselves. We recommend the following modification:

Change from “The council is continuing to work with adjoining authorities to deliver sites in adjoining districts to help meet Oxford’s housing needs to address the unmet housing need.”

To “The Council is continuing to work with adjoining authorities to deliver housing in adjoining districts to help meet Oxford’s housing needs to address the unmet housing need.”

## POLICY E1 (EMPLOYMENT STRATEGY)

<b>94. Do you consider that policy E1 is sound?</b>	
Yes	X
No	

<b>95. If you do NOT consider policy E1 to be sound, please select your reasons why from the choices below.</b>	
Policy is NOT positively prepared	
Policy is NOT justified	
Policy is NOT effective	
Policy is NOT consistent with national policy	

<b>96. Do you consider that policy E1 is legally compliant?</b>	
Yes	X
No	

<b>97. Please set out, as precisely as possible, what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above</b>
<p>We raised issues with this policy at Preferred Options stage because there was no justification for the definition of the key employment sites. We welcome the publication of the Key Employment Sites Methodology (BGP-004a), which represents an improvement in transparency compared with the Preferred Options stage material. We comment on the accompanying Employment Land Needs Assessment (ELNA) below.</p> <p>We commented at the Preferred Options stage on the evidence contained in the first Employment Land Needs Assessment (ELNA). We also asked for further engagement as we awaited more detail in the ELNA.</p> <p>Our concerns about the ELNA at Preferred Options stage can be summarised as follows:</p> <ul style="list-style-type: none"><li>- it did not define employment needs;</li><li>- that it served no purpose to critique other neighbour's FEMA boundaries;</li><li>- that it made an assertion that past practice is for logistics need to be met outside the City, without supporting evidence or reference to a previously agreed approach;</li><li>- reference to an Oxfordshire Housing Market Area although HMAs no longer formed part of national policy.</li></ul>

The City Council has published a final ELNA dated January 2026.

Oxford City Council responded in the consultation statement by agreeing there was a lack of definition of employment need in the ELNA, confirming that needs would not be defined until Regulation 19 stage. The January ELNA now has a quantified need assessment. We note that it tests three scenarios to inform needs, a labour demand, a labour supply and past trends, and then selects a hybrid preferred scenario as the method. We welcome that the chosen scenario and that its job growth forecasts do not create labour supply imbalances to a significant degree.

The methodological concerns we raised at Preferred Option stage about the need to critique other areas functional economic market area (FEMA) boundaries remain unaddressed.

There remains no cross-boundary practice in place for dealing with logistics. However, given there is now evidence of very little outstanding need, we do not consider the missing justification for the ELNA approach to be significant.

The 2026 ELNA no longer relies on the Oxfordshire HMA as an evidential input to define the FEMA or support employment-land conclusions, which we wholly support.

**CHAPTER 8 (INFRASTRUCTURE, AREAS OF FOCUS AND SITE ALLOCATIONS)**

**527. Do you wish to comment on any other part(s) of Chapter 8? Please state the relevant section or paragraph reference(s)**

Policies I2 and G6 alongside the accompanying policies map, and the Infrastructure Delivery Plan.

**528. Do you consider that the parts of chapter 8 mentioned above are sound?**

Yes	
No	X

**529. If you do NOT consider the parts of chapter 8 mentioned above to be sound, please select your reasons why from the choices below**

Policy is NOT positively prepared	
Policy is NOT justified	
Policy is NOT effective	X
Policy is NOT consistent with national policy	

**530. Do you consider the parts of chapter 8 mentioned above are legally compliant?**

Yes	
No	X

**531. Please set out what change(s) you consider necessary to make the stated part(s) of the chapter legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above**

To make the map effective, no policy designations should appear outside the Local Plan area. The plan's policies do not apply outside the plan area. Currently, both the interactive and PDF maps indicate that policies I2 (East West Rail) and I2 (Oxford Flood Alleviation Scheme (OFAS)) are safeguarded in neighbouring districts and that Policy G6 (Local wildlife sites) applies outside Oxford's boundary.

The map shows significant tracts of land within the Vale of White Horse district between Kennington, South Hinksey, and North Hinksey safeguarded for OFAS, as well as numerous local wildlife sites in both South Oxfordshire and Vale of White Horse.

In the Infrastructure Delivery Plan, the section related to water supply and wastewater ends abruptly at paragraph 7.57, which appears to be a publishing error. The missing information may be relevant to our districts as we share the same Oxford Sewage Treatment Works catchment. We ask that this section is reviewed and shared with us as soon as is possible.