

Policy and Programmes

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Dear Oxford City Council

Thank you for the opportunity to comment on your Local Plan 2042 Preferred Options consultation.

Overall, it has been difficult to draw firm conclusions about the Plan's draft policies because much of the supporting evidence which would typically guide policy development is incomplete at this stage.

We have structured our response by Local Plan chapter and policy wherever possible.

Duty to Cooperate

A significant omission at this Regulation 18 stage is the absence of an interim Duty to Cooperate (DtC) statement or a dedicated background paper. Without it the transparent identification of the potential cross-boundary impacts of your proposed plan are missing. This impedes neighbouring authorities' ability to understand which potential strategic matters are being addressed within this Local Plan, and to understand Oxford City Council's perspective on the status of any required resolutions for these matters. This is a particular concern because we still have no response to our response to your Duty to Co-operate Scoping Statement consultation of 28 April 2025, and what strategic matters you intend to present.

To facilitate necessary dialogue and in the absence of an explicit statement or response to what the strategic matters are, we identify the following as potential strategic matters requiring active engagement, to resolve potential cross-boundary issues within this Local Plan:

- Green Belt and Grey Belt (not included in either of your scoped in strategic matters);
- Housing need and supply;
- Affordable housing;

- Economy and Employment;
- Infrastructure.

We recognise that the identification of strategic matters requires evaluative judgments to be made, in the first instance by the plan-making authority, but as matters stand, and based simply on the information that you have presented, we are unable to understand what process has been undertaken to identify the strategic matters that need to be addressed under the Duty to Cooperate. We also recognise that many matters on the content of specific policies may be matters that, when more clearly explained, relate to soundness rather than to the Duty to Cooperate. We would very much hope that further dialogue as the Plan moves forward will help to resolve these issues and we are keen to work with you to achieve that outcome. Nonetheless, given our current concerns, we do need to highlight this issue.

Chapter 1: Introduction and Strategy

Figure 1.1: In Figure 1.1 on page 12 you present hybrid themes 4, 5, and 6. The sequential order of the sustainability pillars within these themes inadvertently suggests a potential hierarchy of importance between economy, society and environment. To avoid misinterpretation and ensure transparency around the principles of the plan, we recommend the inclusion of a short explainer to either explicitly confirm that no hierarchy of importance is implied between economic, social, or environmental themes within Figure 1.1, or provide a clear rationale if the intention is for certain pillars to be prioritised over others.

Draft Policy S3 Infrastructure delivery in new development: The draft policy sets a 1,500m buffer zone around the Cowley Branch Line for contributions from sites now expected to help deliver the branch line. Justification for 1,500m needs to be provided, and evidence should be published to confirm that the included sites can viably deliver this. Policy S3 as written and mapped is not fully deliverable, as it extends beyond the City boundary, and attempts to set policy beyond the scope of the City Local Plan. The buffer zone distance doesn't accord with the liveable neighbourhood principle (20-minute walk comprising 10 minutes there and 10 minutes back, as defined by Oxfordshire County Council's Local Transport and Connectivity Plan - [LTCP document](#)).

Chapter 2: A healthy and inclusive City to live in

Draft Policy H1 Housing requirement: We support the use of the standard method to inform Oxford's housing needs.

We note that the housing number for Oxford based on the standard method is 21,740 and that your preferred option is to set a (lower than the standard method) capacity-based housing requirement for Oxford in Policy H1, which would generate unmet need. Your provisional capacity in the City is at least 9,851 and with the existing sites and provision of around 7,000 homes for Oxford in South Oxfordshire and Vale of White Horse, combined with adopted supply from other authorities (totalling 14,300), there is

more than enough to cater for the amount of unmet need this plan generates. We welcome this.

As agreed during officer meetings, when you have more information on the capacity of Oxford through your emerging Strategic Housing and Economic Land Availability Assessment (SHELAA) work, please engage with us on the capacity calculations prior to your Regulation 19 stage.

Draft Policy H2 Delivering affordable homes: We note your preferred provision level is that at least 80% of affordable housing units should be provided as on-site social rented dwellings and the remainder as on-site intermediate housing. This doesn't align with your Specialist Housing Needs Assessment, Table 4.7 Estimated Need for Affordable Housing (per annum), which gives a 65: 35% split. This deviation should be justified and explained. This is potentially a significant cross boundary matter, as this could influence the tenure mix required for unmet housing need.

To inform Policy H2, you have commissioned Iceni and published a Specialist Housing Needs Assessment. We make several observations below which we suggest are reviewed to provide robust justification for the policy.

1. It is a significant omission to not include households climbing out of need as part of stage 4 of the methodology, and Table 4.5.
2. The Housing Needs Assessment (HNA) needs to consider the impact of in and out migration.
3. The Housing Need Assessment HNA should provide links within the footnotes to any data used, such as Office for National Statistics (ONS) modelled income estimates and data from the English Housing Survey (EHS) or Annual Survey of Hours and Earnings (ASHE).
4. We suggest that the HNA consider using housing benefit eligibility criteria to inform need. The current use of an income multiplier does not take account of different household circumstances and the 35% multiplier currently chosen has no justification.
5. There needs to be a reliable data source for the number of households living in unsuitable housing.
6. Paragraph 4.15 identifies that 'current need is estimated to be 2,446 households'. There should be a description provided about how this figure is arrived at. It also bears no relation to figures in table 4.3, so this should be explained.
7. Table 4.4 estimates current affordable housing need by affordability. There needs to be a reliable data source provided for this estimate.

8. Paragraph 4.19 estimates that 1,160 new households would form annually and two-thirds will be unable to afford market housing, equating to 708 newly forming households of need per annum on average. The assumptions made to inform these figures needs to be explained.
9. Paragraph 4.20 should identify the period considered, and it should provide any data that has informed this section, such as the additions per year to register, if that's what is used.
10. Paragraph 4.22 cites the sources used and the time period to identify supply through relets. As this is not stated for elements of need it's not possible to determine if the time periods align. The choice of a 3-year period should also be justified because the oldest figure of the 3 years has the lowest number of relets, which may inadvertently assume a lower supply.
11. Paragraph 2.45 requires a data source for the 251 homes sold below the lower quartile price.
12. Paragraph 4.33 to 4.34 indicates the need of those who can't afford to rent on the market could be met through affordable rents. However, Policy H2, part b only requires social rents. This requires justification, particularly as the delivery of more social rents impacts viability and the thresholds for the Policy.
13. The analysis on shared ownership, first homes and rent to buy is a simplistic comparison of likely affordability of different products and it should link to data on incomes, savings, and identify the number of households able to afford.

Draft Policy H13 Homes for boat dwellers: References to need in Oxford and Oxfordshire aren't precisely aligned to the joint evidence in the Gypsy and Traveller Accommodation Assessment (GTAA) at paragraph 9.30, and this should reflect the evidence.

Chapter 3: A fair and prosperous City with a globally important role in learning, knowledge and innovation

Draft Policy E1 Employment Strategy: This policy proposes a change of approach to allow for the loss of any non-designated employment sites to other uses to support housing delivery. In principle we support this approach, however with little evidence about the impact available to inform our response, we have suggested engagement on alignment across Oxfordshire at the Duty to Cooperate Forum in August 2025. We are concerned that the Interim Employment Land Needs Assessment (ELNA), as well as the draft ELNA outputs presented at the Employment Workshop on 10 July 2025, suggests that the draft policies will result in wider economic impacts on the Oxfordshire economy. We will respond further about this at Regulation 19 stage, when we have more detail.

Appendix 3.1 of the plan lists some 'key' employment sites. It isn't clear how these were selected. This should be explained in order to ensure draft Policy E1 is justified.

We suggest that more information is provided within the accompanying employment background paper, including the criteria used to designate key employment sites, and how these sites (and others that were considered but not selected) scored against these criteria.

Chapter 5: A City that utilises its resources with care, protects the air, water and soil and aims for net zero carbon

Draft Policy R1 Net Zero Buildings in Operation: We support the policy aims for net zero carbon. Currently only a literature review evidences draft policy R1. We suggest that more evidence (including viability) is needed, particularly energy modelling, to ensure the requirements are feasible and viable and that the policy is justified.

Part 3 of draft policy R1 regarding a development's total Energy Use Intensity (EUI) associated with space heating is inaccurate. Where it states 'the portion of the development's total EUI associated with space heating is no more than 20 kwh/m2/yr' this should be reworded to ensure it accurately reflects the space heat demand metric. Space heat demand is the amount of heat needed to keep the building at a comfortable temperature, regardless of how that heat is delivered. Whereas EUI reflects the actual energy use at the meter, taking into account the efficiency of the heating system. All industry frameworks recommend using actual space heat demand as the metric. We recommend that part 3 of this policy is amended to state 'Developments must achieve a space heat demand of no more than 20kWh/m2/year'.

EUI requirements are not specified by building type. We recommend undertaking feasibility work to determine EUI requirements by building type, to assess whether they can be more ambitious where technically feasible.

Part 2 of draft Policy R1 should be more specific and refer to limiting unregulated energy demands only, whilst still including a regulated total energy cap set by supporting evidence. Regulated energy is easier to limit than unregulated energy in these cases, so providing a regulated energy cap would allow for carbon emissions to be reduced whilst allowing flexibility for applicants.

We recommend that Policy R1 states that heat networks should be powered from zero emission sources.

Chapter 6 – A City that respects its heritage & fosters design of the highest quality

Draft Policy HD8 Making efficient use of land: We welcome the introduction of minimum density targets for different land types, where achievable. This responds to concerns raised by South Oxfordshire and Vale of White Horse during preparation of the

withdrawn Local Plan 2040. However, supporting evidence explaining the rationale behind density targets is required for Draft Policy HD8 to be justified.

There may be a contradiction between draft Policies HD8 and HD9, as HD9 may restrict the achievable residential density in key locations.

Chapter 7 – A liveable City with strong communities and opportunities for all

Draft Policy C7 Bicycle and powered two wheelers parking design standards:

Numerical or survey style data would be beneficial to justify choices for any standards in this policy.

Draft Policy C8: Motor vehicle parking design standards: Numerical or survey style data would be beneficial to justify choices for any standards in this policy.

Draft Policy C9: Electric vehicle charging: Numerical or survey style data would be beneficial to justify choices for percentage thresholds in this policy.

Transport background paper: The background paper needs to provide justifications for some of the transport policy choices and standards made in draft policies in the Plan. Your use of Census 2021 data for modal share or origin-destination, rather than the generally more reliable 2011 data, also needs justification.

Evidence Base

Green Belt and Grey Belt

The National Planning Policy Framework (NPPF) makes it clear that where an authority cannot meet its identified needs, it should look to the Green Belt to meet those (para 146) by reviewing Green Belt boundaries. This is acknowledged in your Green Belt background paper.

The Planning Practice Guidance (PPG) also sets an expectation for authorities to identify which parcels of the Green Belt constitute Grey Belt. Decisions should then be made about which of those may be appropriate for allocation. These decisions need to be made whilst identifying if the release or development of the assessment areas would fundamentally undermine the five Green Belt purposes of the remaining Green Belt. This has the potential to significantly impact neighbouring authorities, and as paragraph 3.9 of your Green Belt background paper acknowledges, this won't be judged until preferred options and allocations are suggested, so this will be at Regulation 19 stage.

At this stage, no draft preferred option or alternatives for Green Belt or Grey Belt are provided within the consultation document. This is a significant omission in advance of Regulation 19.

Your Oxford LUC Green Belt evidence (June 2025) is provided. We have the following observations which we suggest are reviewed to provide robust justification for the policies and allocations in the Plan:

1. It would be helpful to have a single comprehensive map within the LUC report showing all the previously assessed and newly assessed sites, rather than two maps (Figures 1.1 and 1.2). It would also be helpful to show on this map which Green Belt parcels have been excluded from assessment on the basis that they are intrinsically undevelopable.
2. Site 112b-5 is not labelled on the map.
3. Site 112-c is not labelled on the map.
4. Site 118 is identified as Grey Belt. Allocating this for housing would not significantly impact on South and Vale.
5. We disagree that Site 144a cannot meet the definition of Grey Belt. Development would cross a tree belt, but Site 144a is surrounded by a significant established tree belt to the west and woodland to the south. We also disagree that the site would form an incongruous pattern of development, because New Marston has a built form which is currently incongruous given the natural features along this corridor influencing earlier development. This parcel would not therefore form any new incongruous development. The conclusions suggest this is a narrow part of the river corridor, however this isn't one of the narrower parts of the corridor, and there are much narrower along the route. This parcel also isn't an open area, it is largely enclosed.
6. We note that sites 180, 188 and 189 are adjacent to South Oxfordshire and are assessed as meeting the definition of Grey Belt.
7. Site 198 is not labelled on the map.
8. Site 311 has been assessed in two separate parts. Given the differing very conclusions for each, for clarity these should be labelled as separate sites.

We would expect collaboration on a forthcoming joint review of Oxford Green Belt (to be undertaken by Cherwell, South Oxfordshire, Vale of White Horse and West Oxfordshire) to be progressed alongside the Oxford Local Plan 2042.

We will comment further on the appropriateness of related Green Belt and Grey Belt policies and allocations at Regulation 19 stage.

Sustainability Appraisal

While the Sustainability Appraisal (SA) purports to test three housing options, the assigned SA scores, especially for the City Council's preferred Option B, lack clear and

transparent justification. It is not evident why Option B consistently receives more positive scores than Options A or C in numerous instances. This appears to be based on an incomplete assessment. The SA commentary itself indicates that judgements are made *without* considering the full sustainability impacts of unmet housing need being accommodated *outside* the City's administrative boundary. Crucially, the sustainability impacts of cross-boundary housing provision do not disappear at the border; they are displaced. These distributed impacts, particularly those associated with Option B's reliance on external provision, could be *worse* than those of Options A or C. For example, accommodating development across more dispersed areas, potentially distant from Oxford's public transport routes, is highly likely to lead to increased car dependency and significantly higher carbon emissions due to longer commuting distances. This critical external impact has been inadequately reflected in the scoring for Option B.

SA Objective 3: The testing under SA Objective 3 focuses primarily on judgements related to densities and the loss of green space. However, it fails to explicitly evaluate the impact of the options on the Green Belt, despite the Green Belt being directly mentioned within the scope of SA Objective 3 itself. This is a significant omission.

SA Objective 7: SA Objective 7's conclusions are based on the *identical impacts* of density and green spaces already assessed under SA Objective 3. This is unnecessary duplication of testing and analysis, which raises questions about the thoroughness and efficiency of the SA process. A robust and unbiased re-evaluation of the housing options should be undertaken.

Oxford Wastewater Treatment Work is mentioned in the Sustainability Appraisal as important infrastructure to upgrade to enable growth in and around Oxford (page 47). This is located within South Oxfordshire and facilitated by the adopted and emerging Plans of South Oxfordshire, but South Oxfordshire District Council isn't mentioned as a partner to work with on the delivery of the necessary upgrades.

Infrastructure Delivery Plan (IDP) Interim Report (June 2025)

Page 27 of the IDP in relation to Cowley Branch line is incorrect. It states:

"This is an important scheme to support growth in the south of the city, as well as on the unmet need sites in South Oxfordshire."

The sites within the adopted South Oxfordshire Local Plan 2036 near to Oxford have never been reliant on Cowley Branch line to be delivered, which this statement implies.

Employment Land Needs Assessment interim report June 2025

We are concerned that the interim Employment Land Needs Assessment (ELNA) does not adequately define the City's employment needs. This deficiency severely compromises the integrity of the consultation process, as it prevents meaningful engagement on the City's preferred employment strategy and the various scenarios that

are indicated for future consideration, but not until the Regulation 19 Plan is published. Without this foundational information, effective and informed consultation is impossible.

The ELNA references a collaborative Oxfordshire-wide study on the need and supply of logistics (paras 2.17, 2.19). We have no knowledge or record of our involvement in, or awareness of, such an assessment. The ELNA's assertion that "past practice is for logistics need to be met outside the City" is made without any supporting evidence or reference to a previously agreed policy. We require justification and clarification for this statement, as it has the potential to significantly and negatively impact the planning and development within our Districts.

We concur with Section 3's definition of Oxford's Functional Economic Market Area (FEMA) as Oxfordshire.

However, we strongly object to the interim ELNA's inappropriate critique of other established local FEMA designations. It is unclear what purpose or evidence this critique serves. Crucially, Oxford City Council has never formally objected to the FEMA boundary established for the South and Vale districts. The interim ELNA erroneously attempts to conflate and review the 2021 Oxfordshire definition of FEMA (from the previous OGNA) with the AECOM ELNA (January 2024) which specifically established the market area for our Districts. These studies had distinct scopes - the AECOM ELNA was specifically commissioned to support the South and Vale Joint Local Plan, focusing solely on our Districts' functional market areas, not Oxford's or Oxfordshire's, as erroneously implied in paragraph 3.35. The Rapleys' ELNA analysis of the market area must be justified independently and on its own merits, rather than attempting to undermine or misinterpret evidence from studies that are irrelevant to Oxford's specific planning context.

Paragraph 3.36 refers to an 'HMA'. We presume this acronym stands for a Housing Market Assessment. However, there is currently no up to date Oxfordshire-wide Housing Market Assessment in existence. Therefore, this reference is factually incorrect, and we strongly recommend its deletion from the document.

We note the intention to use 2021 census data. However, this data is generally considered to have significant limitations for the purposes of employment and commuting pattern analysis, and its use is typically avoided in such assessments. We therefore suggest you need a comprehensive and robust justification for how the 2021 census data can be considered comparable to current and actual commuting patterns. The use of 2021 census data for Oxford's employment evidence inputs will lead to inconsistencies with the evidence bases of neighbouring authorities, which are likely to be using different methodologies. This inconsistency poses a risk to future collaborative planning efforts and could undermine the efficacy of joint strategic approaches across the wider Oxfordshire area if required.

Habitats Regulations Assessment (HRA) Screening Report (June 2025)

We note that Oxford City's HRA methodology remains the same as proposed for its 2040 Plan and that the latest Screening Report make reference (at paras 6.19, 6.30 and 6.31 and Tables 6.5, 6.6, 6.7 & 6.8) to the joint Explanatory Note (*Appendix 6 to the Screening Report*), which was produced collectively by the Oxfordshire authorities in 2024 in an attempt to set out a county-wide approach to assessing the in-combination air quality impacts of planned growth on the Oxford Meadows Special Area of Conservation (SAC).

You are aware that following discussions with Natural England, South and Vale were asked to prepare an HRA Methodology Paper and Non-Technical Briefing Note, which together supersede the approach to the assessment of air quality effects on the Oxford Meadows SAC set out in the Explanatory Note.

Paragraphs 2.10 to 3.29 in our Methodology Paper ([examination library reference LPA20](#)) explain how South & Vale's approach to interpreting traffic modelling data (as agreed by Natural England) differs from the approach outlined in your Screening Report.

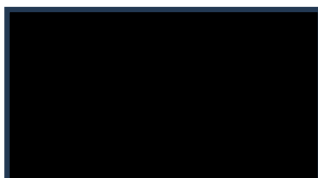
By applying this NE agreed methodology, our draft screening assessment concludes that, *'at Oxford Meadows SAC, likely significant effects are predicted for 'JLP Alone 2' associated with nitrogen deposition alongside the A34 and the A40'*. It also concludes that, *'at Aston Rowant SAC, likely significant effects are predicted for 'JLP Alone 2' associated with ammonia, nitrogen oxides, nitrogen deposition and acid deposition alongside the M40'*. Consequently, both Oxford Meadows and Aston Rowant SACs were taken forward for Appropriate Assessment.

We have undertaken air quality modelling and are preparing an HRA Appropriate Assessment Addendum (to our December 2024 HRA report) which will draw conclusions about atmospheric pollution effects on these two European Sites.

If you were to apply the same methodology as South and Vale to the HRA of your emerging Local Plan 2042 (from an 'alone' and 'in-combination' perspective), we think it is likely that you would need to revisit your screening conclusion at para 6.36.

We will continue to liaise on progress with the HRA of our Joint Local Plan via our officer working group.

Yours sincerely



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