

Statement of Common Ground between Oxford City Council and West Oxfordshire District Council

Submission Draft (Regulation 19) Oxford Local Plan 2045

June 2026

1.0 Introduction

1.1 This Statement of Common Ground (SoCG) has been prepared by Oxford City Council and West Oxfordshire District Council [the parties]. It documents those matters agreed by the parties with regard to the Oxford Local Plan 2045.

1.2 The geographic area covered by this Statement is Oxford City, which is the area covered by the Oxford Local Plan 2045. The matters addressed in the Statement are however cross-boundary in nature. It is one of several Statements prepared with other local authorities and stakeholders. The primary focus of this Statement is on matters specific to West Oxfordshire District and Oxford City. It does not cover the issue of Oxford's unmet housing need which is addressed in a separate, more detailed Memorandum of Understanding prepared jointly with the other Oxfordshire District Councils.

1.3 The Local Plan 2045 has been prepared within a changing strategic national context. The legal Duty to cooperate test was revoked on 25 March 2026 and has been replaced by a policy test whereby plan-making authorities now should demonstrate 'effective cooperation'. This SoCG reflects and confirms the current position on matters agreed or not agreed by both parties, with regard to the test of 'effective cooperation'.

1.4 This statement is provided without prejudice to other matters of detail that West Oxfordshire District Council may wish to raise during the Oxford Local Plan examination.

2.0 Background and governance arrangements

2.1 Various mechanisms for cooperation exist, as set out in Table 1 of the City Council's Cooperation Statement (published as the [Duty to Cooperate Statement 3](#) alongside the Regulation 19 publication and updated as the Cooperation Statement for submission). This includes the Oxfordshire Leaders Joint Committee, which has replaced the Oxfordshire Growth Board. At the strategic level, the authorities collaborate on economic matters through Enterprise Oxfordshire, which prepares the Strategic Economic Plan.

2.2 Oxford City Council and West Oxfordshire District Council have been working closely together on a number of matters of strategic cross boundary importance.

3.0 Matters on which the parties agree

Maintenance of effective cooperation

3.1 Oxford City Council has proactively engaged with West Oxfordshire District Council through the preparation of the Oxford City Local Plan 2045 on a number of cross boundary issues. More information and details of this engagement can be found in Oxford City's Cooperation Statement and the table in Appendix 1.

3.2 The parties agree that Oxford City and West Oxfordshire District Councils have engaged constructively, actively and on an on-going basis to secure effective cooperation on strategic cross boundary matters in relation to the preparation of their respective Plans.

3.3 The parties agree that the 20 year plan period of 2025-2045 should ensure a period of at least 15 years from the date of adoption, and that the base date of both parties' emerging plans of 1st April 2025 aligns. West Oxfordshire's emerging Local Plan is intended to run until 2043 – two years' less than the Oxford Local Plan. The parties agree that this is a matter for West Oxfordshire and has no direct implications for the Oxford Local Plan 2045.

Housing need

3.4 The parties agree that:

- The SM should be used to assess local housing need in accordance with national policy.
- As of May 2026, the local housing need for Oxford calculated using the Standard Method is 1,078 dwellings per annum.
- When applied over the Oxford local plan period 1st April 2025 – 31st March 2045, the total housing need is 21,560.

Housing capacity

3.5 The parties agree that:

- Oxford does not have the capacity to meet in its identified housing needs in full from 2025-2045.
- On this basis, it is justified to set a capacity-based housing requirement for Oxford.

3.6 In their Regulation 19 representation, West Oxfordshire suggested that Policy S1 should be clearer that housing is a priority in the city. This comment is summarised and responded to in Appendix 2.

Employment need

3.7 The parties agree that

- Oxford City does not require West Oxfordshire to accommodate any of its employment needs to 2045.
- West Oxfordshire does not require the city to accommodate any of its employment needs to 2045.

Other strategic matters

3.8 A number of other potential cooperation issues were identified in Oxford City Council's Cooperation Statement. Conversations have been on going around these issues. Both parties are in

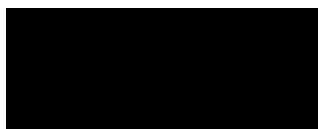
agreement that there are no outstanding cooperation or other soundness concerns in relation to these issues.

3.9 In relation to other strategic matters, the parties agree that:

- The cumulative impact of growth on the local and wider transport network is a strategic matter and the Councils will work constructively with Oxfordshire County Council, Highways England and other stakeholders to plan for future highway infrastructure improvements and to support the delivery of the Oxfordshire Local Transport and Connectivity Plan (LTCP5).
- The parties have worked collaboratively with the other Oxfordshire authorities on a Gypsy and Traveller Needs Assessment (GTAA) to inform their respective Local Plans. There is no need arising from Oxford city.
- There are currently no outstanding cooperation concerns between the two parties in relation to the issue of provision of health infrastructure and local facilities.
- There are currently no outstanding cooperation concerns between the two parties in relation to the issue of climate change mitigation and adaptation including flood risk.
- There are currently no unresolved cooperation concerns relating to the provision of retail, leisure and other commercial development.

Signed on behalf of West Oxfordshire District Council

Chris Hargraves

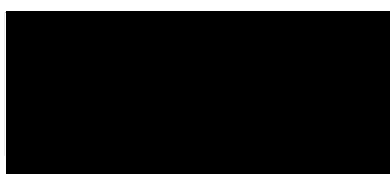


Head of Planning

Date: 02/07/26

Signed on behalf of Oxford City Council

David Butler



Director of Planning and Regulation

Date: 26/06/26

Appendix 1: Key meetings and information sharing during preparation of the draft plan

Date	Type of engagement	Topic/s
26.02.25	HELAA workshop Oxfordshire authorities (LPAs and County)	General update on start of HELAA process
24.04.25	Meeting between all Oxfordshire LPAs	Scope of the Duty to Cooperate, mechanisms of cooperation, Green Belt, housing need and supply, specialist housing need.
19.06.25	Oxfordshire Duty to Cooperate Forum	Housing capacity, housing need, Green Belt, ELNA
24.07.25	Oxfordshire Duty to Cooperate Forum	Housing need and apportionment, ELNA, retail needs
29.07.25	Bilateral officer meeting	To discuss unmet need position in respective emerging Regulation 18 documents.
19.08.25	Oxfordshire Duty to Cooperate Forum	ELNA, housing need, specialist housing need
11.09.25	SHLAA Workshop all Oxfordshire authorities	Presentation from the city. Explained change of Plan period and resulting updates to the evidence base, including SHLAA. Went through new and updated sites, explained site size threshold and windfall approach and approach to Green Belt.
23.09.25	Oxfordshire Duty to Cooperate Forum	Housing need including amendment of Plan period and impacts on delivery. Made clear again there would be unmet need.
21.10.25	Oxfordshire Duty to Cooperate Forum	Unmet housing need, water cycle study, green infrastructure and Green Belt.
31.10.25	OXFORD FORMAL REQUEST LETTER	Letter sent to other Oxfordshire LPAs formally asking for help with Oxford's unmet need.
20.11.25	West Oxfordshire respond positively to formal request letter	
14.11.25	Oxfordshire Duty to Cooperate Forum	Focus on city sites following the further call for sites made as a result of the changed plan period, update on sites. Acknowledgement formal request letter had been sent.
10.12.25	Oxfordshire Duty to Cooperate Forum	Discussion mainly about the proposed programme for work for the group about agreements for Oxford's unmet housing need apportionment.
18.12.26	Oxford circulate draft SHLAA	
15.01.25	Oxfordshire Duty to Cooperate Forum	Draft interim joint SoCG between all Oxfordshire LPAs
26.02.26	Oxfordshire Duty to Cooperate Forum	SHLAA workshop
16.03.26	Oxfordshire Duty to Cooperate Forum	Unmet Housing Need
09.04.26	Bilateral meeting	Discussion about Reg 19 rep and SoCG

Appendix 2: Detailed comments and responses

Summary of Comment in West Oxfordshire District Council's representation	Oxford City Council response	Final position
Policy S1- spatial strategy and presumption in favour of sustainable development Whilst generally supportive of Policy S1, we suggest that the Local Plan should avoid unnecessary repetition of national policy regarding the presumption in favour of sustainable development. This will also avoid Policy S1 becoming quickly out-of-date against the new NPPF. Also concerned Policy S1 does not reference the importance of maximising the delivery of new homes in suitable and sustainable locations. Given the capacity-based housing requirement, there must be explicit commitment to maximising delivery of new homes.	Modifications are proposed to S1 to avoid repetition of the presumption in favour of sustainable development. Also, a new bullet point (e) is proposed that says 'prioritise new homes in all suitable and sustainable locations'. The last part of bullet point (e) (that will become f)) was intended to make this clear, but we agree on reflection that it would be clearer as its own bullet point. Proposed modifications as follows: Amend policy title on page 10 and heading on page 9 as follows: Spatial Strategy and Presumption in Favour of Sustainable Development Policy S1: Planning permission will be granted where development proposals accord with the policies of the Plan taken as a whole. <u>Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise. The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can be approved wherever possible, to secure development that improves the</u>	The proposed modification is considered to resolve West Oxfordshire District Council's previously stated concerns on this issue.

economic, social and environmental conditions in the city

The City Council, through its policies and decisions, will positively pursue sustainable development and achieve sustainable growth in the delivery of homes, jobs and services to create a network of healthy, well-connected, high-quality areas where people want to live, play, learn and work in line with the vision and objectives of the Local Plan. To help achieve this it will aim to ensure development is located to:

...

e) Prioritise new homes in all suitable and sustainable locations;

ef) Focus new employment development on existing sites only, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere;

[Re-number what were criteria f, g, h, i and add new criterion j:]

i) Support the health and wellbeing of local communities such as by delivering new sports and recreation facilities or enhancing existing provision.

When determining development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). ~~The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can~~

	be approved wherever possible, to secure development that improves the economic, social and environmental conditions in the city. All new proposals for development must conform with the principles of securing sustainable development, which ensures that the city is ready for a net zero carbon future, natural resources and raw materials are used prudently and considerately, the air quality of the city is improved, and human health is safeguarded. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in any neighbourhood plans adopted in the future) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise, considering whether: i) The application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or j) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.	
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Policy H1- Housing requirement No concerns with the principle of a capacity-based housing requirement, but note that the per annum supply assumptions fell from 481 homes per year in the withdrawn OLP2040 to 463 homes per annum in the OLP2045. The supporting text should be expanded to make the position on overall need, including why the assumed supply has fallen, and in turn the 'unmet need' much clearer. The level of unmet need, and that it is lower than 2011-2031, should be explained. The Plan should be unequivocal in terms of the quantum of unmet need and the period that applies to. Acknowledgment of provision previously made for Oxford's unmet need (e.g. in Salt Cross and West Eynsham) should also be referenced.	We do not think that it is appropriate in the emerging plan to compare the housing capacity to that in a previously withdrawn plan. We think that it does need to be clear how the capacity has been assessed, and we consider this is set out clearly in the SHLAA. We do agree that the context section above policy H1 could be used to set out the unmet need position and we propose modifications to include this information, with an additional 4th bullet point: <u>Oxford's unmet housing need is therefore 12,519. The surrounding Oxfordshire districts have formally agreed to meet this need, with the following distribution:</u> .	The proposed modification is considered to resolve West Oxfordshire District Council's previously stated concerns on this issue.
Policy H2- Delivering Affordable Homes Whilst we are largely supportive of the proposed approach to delivering affordable housing, including the priority being given to social rented tenures, we note the reference to the provision of 'genuinely affordable' housing and would simply observe that there is no such definition within the NPPF.	Comment noted. The City Council considers that affordability and housing costs in Oxford are such an issue that this approach is necessary in order to assure affordable housing needs are being met by the products provided as affordable.	West Oxfordshire District Council notes that no modification is proposed and we therefore maintain the point that the NPPF does not define 'genuinely affordable' housing. That said, the District Council does not consider this to be an issue of soundness that goes to the heart of the plan and accept that it is ultimately a matter for the appointed Inspector to resolve.