

**Statement of Common Ground between Oxford City Council and South Oxfordshire District Council
and Vale of White Horse District Council**

Submission Draft (Regulation 19) Oxford Local Plan 2045

July 2026

1.0 Introduction

1.1 This Statement of Common Ground (SoCG) has been prepared by Oxford City Council, South Oxfordshire District Council, and Vale of White Horse District Council [the parties] for the Oxford Local Plan 2045. This SoCG reflects and confirms the current position on matters agreed or not agreed by all three parties, with regard to the Oxford Local Plan 2045.

1.2 The area covered by this Statement is Oxford City Council, which is the area covered by the Local Plan 2045. The matters in this Statement are, however, cross boundary and other SoCGs have been prepared on cross boundary matters with other authorities and stakeholders, in addition to an interim joint statement of common ground between the four Oxfordshire districts and Oxford City Council specifically on the subject of Oxford's housing need, which is not repeated here to reduce repetition. This Statement of Common Ground goes into more detail on matters specific to South Oxfordshire, VoWH and Oxford, to be considered alongside the Memorandum of Understanding.

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 The legal Duty to cooperate test was revoked on 25 March 2026 and has been replaced by a policy test whereby plan-making authorities now should demonstrate 'effective cooperation'.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 all parties with regard to the test of 'effective cooperation'.

1.4 This statement is provided without prejudice to other matters of detail that South Oxfordshire or Vale of White Horse (VWH) District Councils (DCs) may wish to raise during the Oxford Local Plan examination.

2.0 Background

2.1 Various mechanisms for cooperation exist, as set out in Table 1 of Oxford City Council's Cooperation Statement. 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.

2.2 Oxford City Council and South Oxfordshire and Vale of White Horse District Councils have been working closely together on a number of matters of strategic cross boundary importance.

3.0 Maintenance of effective cooperation

3.1 South and Vale District Councils and Oxford City Council agree that the plan will now be assessed on effective joint working on strategic cross-boundary matters as a soundness matter. Both parties agree that effective engagement has been and continues to be achieved and that Oxford City Council has proactively engaged with South Oxfordshire and Vale of White Horse District Councils throughout 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.

4.0 Key Strategic Matters

Housing need, capacity and unmet need to 2045

4.1 Matters relating to Oxford City Council's housing need, housing capacity, housing requirement and unmet need are discussed in the Joint Interim Statement of Common Ground and Memorandum of Understanding. South Oxfordshire and VOWH have raised some detailed matters relating to the treatment of housing in the vision and strategy and Policy H1, as well as in relation to the Specialist Housing Needs Assessment. These are summarised and responded to in Appendix 2.

4.2 The interim position of South Oxfordshire and VoWH District Councils was that the capacity-based housing requirement of at least 9,267 new homes is evidenced and justified. The City Council's updated capacity work for submission has resulted in a decreased total capacity of 9,041 new homes. South and Vale will review the evidence of the SHLAA once it is published, and may wish to comment on the capacity calculation and proposed amendments to the housing requirement in H1 during the examination.

Employment needs

4.3 Oxford does not require South Oxfordshire or VoWH Districts to accommodate any of its employment needs to 2045. Neither do those councils at this stage require the city to accommodate any of their employment needs.

4.4 The interim position of South Oxfordshire and VoWH District Councils is that the employment strategy set out in policy E1 is sufficiently justified by the underlying evidence base; the 2026 Employment Land Needs Assessment (ELNA). South and Vale welcome that the ELNA's preferred hybrid scenario and associated job growth forecasts do not create labour supply imbalances to a significant degree. However, some methodological concerns remain, including the critique of functional economic market area boundaries in the ELNA and the lack of strategy for dealing with cross-boundary logistics.

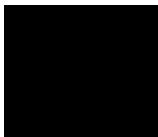
5.0 Other matters

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

5.2 In relation to other matters, the parties agree that:

- The Oxford Meadows Special Area of Conservation (SAC) is close to South Oxfordshire and Vale of White Horse DCs. Air quality and recreation are the key issues affecting the quality of the SAC.
- The councils have ensured their work on respective HRAs is coordinated. Both Oxford City Council, and South Oxfordshire and Vale Councils, have undertaken Habitat Regulations Assessments to support their respective plans. Each authority's Habitat Regulations Assessment has been produced in consultation with Natural England. Key issues at the Oxford Meadows SAC which are covered in the HRA include air quality and recreational impacts. The councils have worked to ensure that relevant work on their respective HRAs has been undertaken in a coordinated manner.
- 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. South Oxfordshire and VOWH have raised concerns about the wording in relation to Cowley Branch Line contributions in Policy S3. The comment is summarised in Appendix 2, with a response.
- The parties have worked collaboratively with the other Oxfordshire authorities on a Gypsy and Traveller Needs Assessment to inform their respective Local Plans. There is no need arising from Oxford city.
- There are currently no outstanding cooperation concerns between the parties in relation to the issue of provision of health infrastructure and local facilities.
- There are currently no outstanding cooperation concerns between the 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 South Oxfordshire District Council



Tim Oruye

Title: Director of Policy and Programmes

Date: 6 July 2026

Signed on behalf of Vale of White Horse District Council



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Title: Director of Policy and Programmes

Date: 6 July 2026

Signed on behalf of Oxford City Council



Director of Planning and Regulation

Date: 13/07/26

Appendix 1: Key meetings and information sharing regarding the Oxford Local Plan 2045

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
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	South Oxfordshire and Vale of White Horse District Councils 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.
18.12.25	Oxford circulate draft SHLAA	
15.01.26	Oxfordshire Duty to Cooperate Forum	Draft interim joint SoCG between all Oxfordshire LPAs
26.02.26	Oxfordshire Duty to Cooperate Forum	SHLAA workshop – went into site by site detail about capacity changes, with follow up queries and emails. E.g. explanation given for not including previous Summertown Strategy Site (lack of landowner interest), reasons for increased capacity at Templars Square, reasons for reduction in capacity at Diamond Place, in spite of increased area.
16.03.26	Oxfordshire Duty to Cooperate Forum	Unmet Housing Need
09.04.26	Bilateral meeting	Discussion about Reg 19 rep and SoCG
01.05.26	Oxfordshire Development Plan Cooperation meeting	Discussion about skeleton for Memorandum of Cooperation
21.05.26	Oxfordshire Development Plan Cooperation meeting	Apportionment of unmet need and draft Memorandum of Cooperation

Appendix 2: Detailed comments and responses

Summary of Comment in South Oxfordshire DC and Vale of White Horse's representation	Oxford City Council response	Final position
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Policy S1 Criteria e says “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, whereas 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. Change from “e) Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere”. 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”.	Modifications are proposed to S1 to make it clearer that housing is prioritised. 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: ...To help achieve this it will aim to ensure development is located to: ... <u>e) Prioritise new homes in all suitable and sustainable locations;</u> <u>f) Focus new employment development on existing sites only, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere;</u> ...	Agreement
Policy S3 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	It is agreed that a change to the wording of S3, to bring it in line with the CBLAOF Policy wording, would be helpful. Proposed Modification to S3: Supporting existing public transport and the reopening of the Cowley Branch Line to passengers would enable a reduction in car use to this area.	Agreement

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: “... 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.”	Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations (<u>where it falls within the city’s boundaries</u>) will be expected in order to achieve public transport enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL.	
Chapter 1 Vision and Strategy The Vision is generally positive, however it provides limited support for delivery new homes and affordable housing within the city. As a result, the protection of assets appears to be prioritised over delivery of homes.	The very start of the Vision talks about healthy and inclusive communities and access to housing. Furthermore, the first two objectives are: • Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all. Therefore, the City Council does not agree that there is limited support for delivery of new homes and affordable housing or that protection of assets is ‘prioritised’ over delivery of new	South Oxfordshire and Vale of White Horse DCs remain of the view that a commitment to delivery of affordable housing remains weak within the vision.

	homes. It is acknowledged that there are many elements of creating a successful city, some of which will involve protections. The City Council proposes no modifications in response to this comment.	
Policy H2 Delivering Affordable Homes 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.	South Oxfordshire and VWHDC have confirmed that their concerns raised at Regulation 18 largely still stand. The concerns are set out in a separate table for South Oxfordshire and VWH DC in the 'Supporting documents, general and other comments' section of the Regulation 18 Consultation Report, with responses to each listed concern from the City Council. The City Council does not propose further changes to this piece of evidence.	The evidence underpinning Policy H2 appears to contain significant gaps in methodology, justification and transparency. In particular, there is insufficient explanation of how affordable housing need has been calculated, limited reference to robust data sources, and inadequate justification for key assumptions and policy choices, including the proposed emphasis on social rent. As a result, it is not clear that the policy is supported by a sound evidence base.
Policy H1 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."	The City Council continues to think the reference to sites is relevant and appropriate. In most cases, unmet need is intended to be delivered on specific and known sites. The City Council liaises with district councils about those sites. Reference to sites in this context is not considered unsound.	South Oxfordshire and Vale of White Horse DCs remain of the view that the wording implies that the City Council delivers sites outside its area, which is impossible.

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.	A modification is proposed to the Policies Map to cut layers off at the city boundary.	Agreement
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.	The last sentence from paragraph 7.57 of the IDP should read as follows: However, should rates of house-building increase in the area serving the Oxford WWTW (in line with national Government ambitions to deliver 1.5million homes), this could result in <u>a need for the "additional upgrades" (i.e., the upgrades that are required to accommodate the level of growth proposed after 2041) to be delivered sooner.</u>	Noted with thanks for the update.

