

[REDACTED]

From: Pearce Gunne-Jones [REDACTED]
Sent: 13 March 2026 16:45
To: Planning Policy
Subject: Regulation 19 Representation (Response ID: ANON-M2Q4-48QB-3)
Attachments: OCC Reg 19 Representation_Submitted Form.pdf; Oxford Local Plan 2045_Reg 19 Representation_BSP.pdf

Categories: Handled by IP

Dear Policy Team,

In addition to submitted online form ANON-M2Q4-48QB-3 (attached for reference), please find attached our full representation which should be read in conjunction.

We would be grateful for confirmation of receipt.

Kind regards,

Pearce Gunne-Jones MRTPI
[REDACTED]

Response ID ANON-M2Q4-48QB-3

Submitted to Oxford Local Plan 2045 Submission Draft (Regulation 19) Consultation
Submitted on 2026-03-13 16:03:59

Contact Information

1 Name

Name:
Pearce Gunne-Jones

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5 Organisation Name (if applicable)

Organisation:
tor&co on behalf of Blenheim Strategic Partners

6 In what capacity are you responding to this consultation?

Other

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.

acting as agent?:
Blenheim Strategic Partners

Data Protection Notice and Notification Options

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

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reason to attend hearings:

Because our representation raises strategic matters, and objections to the Plan, that will undoubtedly be the subject of discussion at the examination. In the interests of assisting the Inspectors, our contribution to that discussion could be important in fully exploring the soundness of the Plan.

Policy H1: Housing Requirement

33 Do you consider that policy H1 is sound?

No

34 If you do NOT consider policy H1 to be sound, please select your reasons why from the choices below. Please give precise details for your reasons in the box below - if you wish to support the soundness of the policy please also use this box to set out your comments.

policy is NOT positively prepared, policy is NOT justified, policy is NOT effective, policy is NOT consistent with national policy

h1 comments:

Please refer to representation sent via email.

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Whilst the new Town and Country Planning (Local Planning) Regulations 2026 have now been published and come into force on 25th March 2026, meaning that the legal Duty to Cooperate is not saved, cooperation across boundaries on strategic matters remains a soundness issue. Specifically, the WMS (27th November 2025) states that, "local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas." The Council has not published any evidence to show how the Council have co-operated with their neighbours in preparing this local plan and currently, Policy H1 is not considered sound because it fails as an effective and deliverable policy on the strategic cross boundary matter of housing provision. It fails to maximise the effectiveness of the local plan. The Council will need to provide evidence as to how they have co-operated with regard to unmet needs, in order to demonstrate that the plan is based on effective joint working.

Notwithstanding there may no longer be an issue of legal compliance, under the former DTC, there has been a failure of the environmental principles duty, because the environmental impact of Policy H1, as drafted, has not been fully considered. Specifically the environmental harm that could arise from the failure to set a clear housing target to be met more widely across Oxfordshire and failure to provide distributional criteria associated with such housing provision. For example, such environmental impacts could arise from increased travel distances, to access the city, and associated noise and air quality impacts.

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**OXFORD LOCAL PLAN 2045
Submission Draft
Regulation 19 Consultation**

On behalf of Blenheim Strategic Partners

Response ID: ANON-M2Q4-48QB-3

Date: March 2026

tor
&co

1.0 Introduction

- 1.1 This representation has been prepared by tor&co on behalf of Blenheim Strategic Partners, in response to the Oxford Local Plan Regulation 19 consultation.
- 1.2 Please note this should be read in conjunction with the online submitted form (Ref: ANON-M2Q4-48QB-3).

2.0 Response to Consultation Questions

Policy H1: Housing Requirement

Q33. Do you consider that Policy H1 is sound?

- 1.3 No, for reasons set out under Q34 below.

Q34: If you do NOT consider Policy H1 to be sound, please select your reasons why from the choices below. Please give precise details for your reasons in the box below – if you wish to support the soundness of the policy please also use this box to set out your comments.

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- 1.4 Blenheim Strategic Partners (BSP) is the strategic land promotion entity of the Blenheim Estate, who have significant residential and commercial land interests across Oxfordshire. In this context, BSP strongly agree with the supporting statement within the local plan that *“delivery of housing is a priority for the City Council, and the Local Plan’s strategy is to maximise housing delivery while balancing protection of other important assets such as biodiversity, open space and functional floodplain.”*
- 1.5 Equally, BSP welcome the acknowledgement within the Local Plan that *“Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and demand continues to outstrip supply. This exacerbates inequalities by leading to high property prices and a limited supply of affordable housing.”* Furthermore, BSP would emphasise the importance of the statement *“the supply of available and affordable housing for all is a priority for people, the economy and the services on which we all rely, including healthcare and education.”*
- 1.6 BSP further support the recognition within the supporting text that, *“the minimum housing need figure for Oxford has been calculated by using the Government’s Standard Method as set out in National Planning Policy and guidance. The housing need in Oxford is for 1,087 new dwellings per annum.”* In particular, BSP would emphasise, as referenced within the supporting text itself, that this represents a minimum requirement. This reflects NPPF paragraph 62 which confirms that the SM LHN is a minimum, and the updated PPG (ID: 2a-040-20241212) also confirms that:

“...The Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations.”

- 1.7 Notwithstanding, the supporting text states, “this need is greater than the capacity of the city to deliver it. The assessment of capacity (set out in the Strategic Housing Land Availability Assessment 2026) is 9,267 homes over the plan period, or 463 dwellings per annum.” Further justification for this capacity-led approach is set out in the statement, “Local Plans should seek to meet identified needs, and in establishing a housing requirement figure should show the extent to which their identified housing need can be met over the plan period.” Equally, it is argued that, “the calculated housing need is greater than the capacity identified. Therefore, the housing requirement is less than the housing need, and results in a level of unmet need in Oxford.”
- 1.8 On this basis, BSP would question the approach taken within Policy H1, as currently drafted. Whilst the relationship between need and capacity is briefly explained in the supporting text (as referenced above), the policy fails to provide a transparent and positive framework. To be sound it must be positive and effective, and must set out a strategy (strategic policy) to meet the housing need, including to ensure plan policies for adjacent authorities, on which Oxford will rely to meet unmet need, align (NPPF para 27).
- 1.9 This potential mis-alignment is particularly concerning given that adjacent authorities are currently planning to meet housing need measured according to the pre-2024 standard methodology. In all cases the current need, measured by the 2024 methodology has increased. As a consequence there is a real risk that any said provisions for unmet need (the saved contributions) will ultimately be put under pressure and called upon to meet district need rather than the City’s needs, particularly in circumstances where there is no ‘ring-fencing’. For example, housing needs in Vale of White Horse, South Oxfordshire and Cherwell are over 1,400 home more each year than the plans currently being examined, but which do not ‘ring-fence’ unmet need provision. The Council will need to seek clear policy commitments in the relevant plans so that any additional supply to meet Oxford’s needs will not be used to meet their own needs.
- 1.10 In this context, whilst it is fully understood that the housing requirement referenced in Policy H1 must reflect capacity, the Policy should clearly set out the full need, and a clear commitment to work with adjacent authorities in meeting the quantified level of unmet need. This will provide a clear policy framework to ensure that appropriate provision for housing is met elsewhere in Oxfordshire. This is a policy approach that has been found sound in similar circumstances elsewhere, for example in the Birmingham Local Plan, and the examining Inspectors for the Bristol Plan have also recently (21 November 2025) confirmed that, *“The Council must also set out what the level of unmet housing need is. While the objectively assessed housing need may change over time, we consider it necessary for this Plan to be clear about the situation at the time of adoption. This may, for example, be important in continuing work being done on other Plans. MMs should be drafted to paragraph 6.8 to set out what remaining need exists.”* As a MM this is clearly a matter that goes to the soundness of the plan. Now, in the absence of the Duty to Cooperate (WMS 27

November 2025), the need to address the position in policy, rather than supporting text, is heightened.

- 1.11 Taken together, this highlights the following failures of the plan as drafted:
- 1) There is no clarification of the actual need, taking into account economic and affordability matters, only an expression of the minimum need as set by the standard method
 - 2) There is no clarification as to the level of unmet need that adjacent authorities are expected to meet through aligned policies in their local plans
 - 3) There is no clarification around expectations relating to the spatial distribution of the unmet need and monitoring of that provision, also expectations around levels of and access to any affordable housing to be provided as part of accommodating the unmet need.
- 1.12 Taking this further, it is acknowledged that the previous version of the Oxford Local Plan 2040 was withdrawn on 27th January 2025, based on an annual housing target of 1,322 homes and 841 homes needed to be built outside of the city. This was principally on the basis that Planning Inspectors considered that *“we have serious concerns regarding the engagement that took place with those other authorities in terms of the preparation and publication of the HENA.”* Equally, concerns were raised regarding the deviation from the standard method. However, this does not fully justify the approach taken by Oxford City in how Policy H1 has now been drafted. To clarify, the Inspectors resisted an ‘alternative approach’ to assessing housing need under exceptional circumstances, but did not say there should be no uplift from the SM LHN minimum.
- 1.13 Similarly, this does not justify the approach of failing to set clear expectations, and a sound strategy, for meeting the housing need in full, including through cooperation with adjacent authorities. As set out in NPPF paragraph 36a), in order for local plans to be considered sound, and positively prepared, they need to provide *“a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs.”* Policy H1, as currently drafted, fails to do that.
- 1.14 Additionally, and with respect to the minimum requirement, the evidence of need is overwhelming, providing a clear justification for an uplift to the overall level of need, from that minimum figure. The Council’s own Background Paper 001 addressing ‘Housing Need, Requirement and Mix’ confirms, *“Oxford has acute housing pressures that need to be addressed... Oxford is an international city and important part of the knowledge economy, with a world- renowned university and hospitals... The supply of available and affordable housing is a priority in supporting the economy, including healthcare and education needed for the city, because it means that staff can be both attracted and retained more readily.”*
- 1.15 It is also important to consider the conclusions of the Interim Report of the Oxford Growth Commission (published December 2025). This states that *“planning policies need to support agglomeration and maximising economic growth and benefits by ensuring the availability and allocation of suitable land in and around the city of Oxford and in key established economic locations countywide for both economic and housing development.”*

- 1.16 Furthermore, the report outlines that, *“the gap between Council plans for new housing and what is already needed has widened. In December 2024 the Government introduced a new Standard Method for setting housing need which identified an annual need for 5,301 new homes across Oxfordshire. These minimum needs also do not make any specific allowance for a growth strategy and to support the potential for economic growth in a sustainable way, delivery above the new standard method will be required, as envisaged in paragraph 69 of the NPPF.”* Critically, the report highlights that, *“Local plans for Oxfordshire as a whole need as soon as possible to meet the minimum housing needs set by Government with a further allowance to support the scale of economic growth across the County.”* (our emphasis)
- 1.17 This is also reflected in the Oxfordshire Infrastructure Strategy (OxIS), published in draft for consultation August 2025. This discusses a 10% uplift on the SM LHN, after an initial five-year period based on the current Oxfordshire districts collective local plan requirements. A **10% uplift** would not be unreasonable, indeed the Growth Commission Report discusses opportunities to deliver these levels of additional growth across Oxfordshire.
- 1.18 Given this evidence, there can be no doubt that there is a direct correlation between economic and housing growth, and the current approach for defining Oxford City’s housing requirement, as expressed and set out in Policy H1, represents a significant risk to regional economic growth across the local plan period.
- 1.19 In summary, setting the Policy H1 requirement on the basis of the anticipated deliverable supply / capacity alone, with no reference to the overarching need, no identification of the level of unmet need, and no policy commitment to cooperating with neighbours to meet that need, does not represent a sound basis to take the plan forward, and risks exacerbating the chronic housing affordability challenges within Oxford City, as well as representing a significant risk to the ambitions of the wider Growth Corridor. The housing target must clearly be set out within the policy, using the SM LHN as a minimum, which would represent a significant uplift on the current stated housing requirement figure of 463 dwellings per annum. Similarly, there needs to be a clear acknowledgement of the unmet need requirement from neighbouring authorities, as being necessary to support housing delivery, and meeting the deficit.
- 1.20 Policy H1 as currently drafted fails to address the relationship between existing commitments to unmet need from neighbouring authorities, the economic growth and delivery timescale expectations associated with those commitments, and then to provide a clear housing target for the full plan period based on Oxford City’s SM LHN with an uplift to continue growth, identifying then what level of supply, and therefore housing requirement, can be accommodated within the City’s boundaries and what target would need to be met by the adjacent districts. The Background Paper 001 ‘Housing need, requirement and mix’ provides no assistance in understanding the position. Further, the policy should set expectations about the distribution of those homes, in broad terms, and their contribution to the City’s affordable need. In the absence of a strategic plan this is the only policy mechanism to clearly and transparently address and test the matter.

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- 1.21 No.
- 1.22 Whilst the new Town and Country Planning (Local Planning) Regulations 2026 have now been published and come into force on 25th March 2026, meaning that the legal Duty to Cooperate is not saved, cooperation across boundaries on strategic matters remains a soundness issue. Specifically, the WMS (27th November 2025) states that, *“local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas.”* The Council has not published any evidence to show how the Council have co-operated with their neighbours in preparing this local plan and currently, Policy H1 is not considered sound because it fails as an effective and deliverable policy on the strategic cross boundary matter of housing provision. It fails to maximise the effectiveness of the local plan. The Council will need to provide evidence as to how they have co-operated with regard to unmet needs, in order to demonstrate that the plan is based on effective joint working.
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