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OXFORD CITY COUNCIL

Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Oxford Growth Group

Organisation (if applicable): Oxford University, Brasenose, Christ Church, Lincoln, Magdalen, Merton, N

Address: [redacted]

[redacted]

[redacted]

Email: [redacted]

Date: 13/03/26

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	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	○	◉
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the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 is adopted by the Council?	◉	○

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For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
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OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team
T: 01865 252847
planningpolicy@oxford.gov.uk
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

13 March 2026
L 260313 JG - OCC Reg 19 representations - Final version

Planning Policy Team
Oxford City Council
Via email

David Jackson
E: [redacted]
M: [redacted]
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savills.com

Dear Sir/Madam,

Oxford Local Plan 2045: Submission Draft (Regulation 19)
Response to Regulation 19 on behalf of the Oxford Growth Group

Savills is instructed as advisor to the Oxford Growth Group, which in this instance comprises the Oxford University, Brasenose, Christ Church, Lincoln, Magdalen, Merton, New and St John's Colleges (the Group). The Group has engaged with the Oxfordshire local authorities over the last decade through representations to plan-making processes across the county. These representations have been consistent in aiming to ensure that the housing, employment and other needs of Oxford can be met in the most sustainable way both within the City and the adjoining authorities.

The Group is grateful for this opportunity to respond to the Regulation 19 consultation of the emerging Oxford Local Plan 2045 (the R19 Plan). Whilst these representations are submitted on behalf of the Group collectively, separate representations may be made individually by its members on more detailed and site-specific matters.

The strength of the City's economy is underpinned by both direct and indirect economic contributions that the University & Colleges generate. The University is responsible for over 17,000 jobs locally, comparable to roughly 10% of the City's population, and injects £750 million annually into the local economy. The buildings that the University operates and maintains also contribute to Oxford's attraction as a tourist destination, with tourists spending £611m annually in the local economy. In addition, the University & Colleges produce the highest intensity of university-created spin-out companies in the country.

The Group previously submitted representations to the now withdrawn Oxford Local Plan 2040 ('LP40'), which covered the following matters:

- procedural/legal requirements;
- housing need and the housing requirement;
- unmet housing need of the City and how it needs to be addressed;
- the role of strategic allocations outside of Oxford's administrative boundaries;
- flexibility in relation to new development, particularly density and height standards;
- the need for student accommodation to support the role of University & Colleges; and
- innovation in a number of sectors including life sciences, energy, technology/computing and digital health need suitable weight as well as emerging housing needs

Some of these themes are further addressed in this representation for the R19 Plan (see below).

Spatial Strategy in Oxfordshire

The Group is concerned that policies within the R19 Plan do not set out a spatial strategy on how it will deal with the unmet housing needs of Oxford, and that the City is not looking to accommodate more growth within

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its own boundary to meets its identified needs. The previous round of plans in the period 2015-2021 relied upon the Growth Deal and the strategic planning which resulted in an agreement of the Oxfordshire authorities to deliver 14,300 units of Oxford's unmet need. In part the backdrop to strategic planning in the county relates to the process of Devolution and Local Government Reorganisation with 3 proposals having been presented to Government for the future administration of the county.

One of the purposes of reorganisation is to establish a more strategic approach to the future planning of the county and the opportunity to embed that approach should not be lost even in advance of the new structure being introduced. In that context, the Group recognises that the South and Vale local plan is now progressing to the next stage of examination and that Cherwell's local plan has had initial hearings to assess whether its submission under the transitional arrangements was legally robust. West Oxfordshire meanwhile are yet to submit their local plan for examination. The emerging Oxford R19 Plan is key to all these plans, as the City cannot meet its own needs (P31 of the R19 Plan, first bullet) and therefore the unmet needs of the city need to be clearly communicated and agreed by the other authorities through the preparation of their respective plans.

The R19 plan itself does not set out a strategy for delivering the unmet need that results from the adopted level of housing requirement (463 dpa) that the City is targeting, against the objectively calculated need (1,087 dpa). A statement of common ground (SOCG) between the City and the other surrounding Oxon authorities prepared for the Oxford City Regulation 19 consultation, dated 30th January, seeks to confirm agreement that:-

- the use of the new standard method for calculating housing need is acceptable;
- the unmet need of Oxford is 12,373 homes for the period 2025-2045;
- the previously agreed figure for unmet needs of Oxford was 14,300; and
- that 1,657 homes have been delivered and 12,643 remain to be delivered from the agreed level and that the authorities remain committed to deliver this remainder.

Since the publication of the SOCG it was stated at the Cherwell EIP by both Cherwell and Oxford City teams that the agreed figure of 14,300 for unmet need still meets the needs for Oxford in the period to 2045. Therefore no additional unmet need figures are being sought. The Group recognises that the outstanding number of units to be delivered of 12,643 exceeds the calculated unmet need of 12,373, but if a higher level of growth were being targeted in the City, as there was in LP40 then unmet need would likely be higher given the constraints on development in the City. There remain concerns about delivery of the agreed unmet need following the withdrawal of the legal requirement for the Duty to Cooperate across boundaries on March 25th 2026.

Policy S1 - Spatial Strategy and Presumption in Favour of Sustainable Development

The policy text sets out the proposed approach to meeting the development requirements of Oxford, whilst also covering the presumption in favour of sustainable development. These subjects should be covered by separate policies.

The policy text does not identify the role of adjoining local authorities in contributing to this objective, it is not positively prepared, justified or effective and therefore not sound. Of particular importance is the need to address the unmet housing needs of Oxford given the limited capacity of the city's administrative area. Given these physical constraints on the expansion of the city within its administrative boundaries, it is inevitable that a significant proportion of Oxford's future employment and housing needs will need to be met within adjoining authorities. This was acknowledged in paragraph 1.34 of the adopted Oxford City Plan (2019), which states that:

'*There is not the capacity within Oxford's administrative boundary to meet all housing need*.'

This remains the case in the R19 Plan which states that *'Oxford cannot meet its full housing need*' on the first bullet of page 31 and is demonstrated on page 21 when it states that '*463 dwellings per annum will be met against a need of 1,087 under the new standard method*'. Paragraph 1.34 further set out the approach to addressing this issue, specifically the fact that the Oxfordshire authorities had at that time agreed a strategy to accommodate Oxford's unmet housing need (also see paragraphs 3.10-3.11 of the adopted Plan). The spatial

strategy adopted at the time of the adopted Plan, alongside the other Oxfordshire authorities, was a 'hub and spokes' approach, with the City being the focus for education, tourism and employment but having good infrastructure links into the surrounding Districts where housing is more readily deliverable.

The Group suggests that the policy is split into two, to deal with the spatial strategy and the presumption in favour of sustainable development separately, as having a single policy to cover these two unrelated matters is not considered an appropriate approach. The Group also proposes that the strategy is updated to reflect the hub and spokes approach that emphasises housing delivery in the districts surrounding the city, with employment and economic growth focussed within the city itself.

Policy H1 - Housing Requirement

The full local housing need of Oxford City must be met in order for the City to realise its economic potential, housing being key infrastructure for job creation, as well as to enable the wider sub-region to realise its full potential. As referred to above, this requires a cross-boundary strategy to be agreed with the adjoining authorities (as confirmed by the Inspectors of LP40 in the letter dated 11th September 2024, paragraphs 32-33[1]). The Inspectors' letter at paragraph 40 also identified that housing need should be based upon the standard method, 'unless exceptional circumstances justify an alternative approach'. The City has now adopted this approach, however they then go on to propose a housing requirement which is below the housing need as calculated by the new standard method, without fully justifying this position[2].

Importantly, the standard method provides a minimum figure that can be uplifted, for example in order to recognise additional housing need arising from an uplift in planned economic growth[3]. This is directly relevant in Oxford given the Government's ambitions for the city and the creation of the Oxford Growth Commission and its role '*to unlock and accelerate growth in the city and surrounding area*'[4]. With a housing requirement that is below the housing need, there is a lack of ambition, and this will have the effect of reducing growth and housing delivery in Oxford and in the surrounding authorities (due to the lower figure resulting in a lower unmet need).

To progress a long-term strategy for meeting future housing and economic needs will require cross-boundary working with neighbouring Local Authorities, including decisions being taken to reorganise administrative boundaries to facilitate growth. Such work should also build upon the joined-up approach that was being taken in the Oxfordshire 2050 Spatial Strategy, and take into account the findings of the 'Interim Report of the Oxford Growth Commission' (December 2025) which states (page vi):

> *"Delivering on the strategic vision [A Vision for Oxfordshire, agreed by the Oxfordshire Authorities in 2019] requires a spatial investment and land use strategy across the County that joins up economic growth with investment in transport, new housing including new affordable housing, achieving net zero, nature recovery and the environment, and skills and employability. A vital element in such a strategy is aligning economic growth with requirements for new housing to improve affordability and reduce commuting pressures. However, for some time there has been no countywide strategy; this alignment has not been achieved, and housing affordability and congestion have worsened. The commitment to an Oxfordshire Plan 2050, agreed by the local authorities with Government in 2017, was abandoned in 2022. Since then, the gap between Council plans for new housing and what is needed has widened, with current emerging plans collectively falling well short of the minimum requirements set by Government".*

The outcome of the Local Government Reorganisation proposals, which are expected later in 2026, may address this issue in time depending on which option is chosen.

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[1] https://www.oxford.gov.uk/downloads/file/3600/exam-20---inspectors-post-hearings-letter-to-council-september-2024

[2] NPPF 2024 – Para 11b

[3] NPPF 2024 – Para 69

[4] https://www.gov.uk/government/publications/appointment-of-oxford-growth-commission-chair

The Group object to Policy H1, finding it not to be sound and suggest changes to the text to recognise the growth ambition of the Government through the Oxford Growth Commission report and provides an evidenced uplift to the housing requirement on this basis. The Group considers that the text lacks the ambition for growth present in LP40 and this must be changed in order to meet the expected economic and housing growth in and around the city.

Policy H3 - Affordable Housing Contributions from Other Development Types

The Group objects to this policy as it would negatively impact on commercial investment in the City. The Council previously considered a similarly worded policy to be applied in the period 2001-2016, but following detailed testing this was found to be unviable. The published figures for housing requirement take in to account the need for housing in the local area and also the level of affordable housing required. There is no evidence that employment development will create an additional affordable housing need. The policy text relies on the assumption that employment development will directly result in a need for affordable housing. It also assumes that future employees will live within the bounds of Oxford, rather than more affordable locations in the surrounding Districts and then in-commute to the city.

The Group notes that a Policy with similar wording was included in the Westminster City Plan 2019-2040, which was examined in 2020. Policy 10 of the Submission Draft[5] included a requirement for contributions from certain commercial developments (as defined in that policy). The Inspectors detailed in paragraphs 76 to 88 of their Report how the policy would fail in its objective to provide additional affordable housing and recommended that the Policy be removed. In coming to their conclusion, the Inspectors noted that the policy requirement "*would simply require financial contributions to the City-wide Affordable Housing Fund. It would not achieve the key objective of the submitted Policy 10*" (paragraph 85) to ensure mixed, inclusive and cohesive communities.

The Group maintains that the present market in the City is such that it cannot carry the additional cost that this policy would introduce. This is particularly the case following the introduction of the latest CIL charging schedule, which includes a very significant increase in charge for commercial property. The Group suggests that this policy is removed on this basis.

Policy E1 - Employment Strategy

The Group supports the flexibility in the draft policy, which protects the most important 'key' employment sites, whilst also allowing for their intensification including complementary housing to create mixed use sites. Given the scale of the City's housing requirement, it is right that all options should be considered, including employment sites. However, in those circumstances where employment sites (either in whole or part) are given over to other uses, it is essential that there remains sufficient employment land for the economic potential of Oxford to be fully realised.

Policy R1 - Net Zero Buildings in Operation

The objective of achieving net zero carbon in operation is supported. However, further consideration needs to be given to the requirement for all energy needs to be met through on-site renewable energy generating technologies in the first instance (Policy R1(e)).

The delivery of an on-site solution to meet all energy needs inevitably means designing a system for meeting peak demand. This is grossly inefficient given that the demand profile would rarely match the generation capacity. On most occasions therefore this would require a high proportion of the energy generated on-site to be exported to the grid. However, given the grid constraints that exist in Oxford this would result in most instances with the energy generated going to waste.

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5 https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf

In addition, the cost of providing such technologies on site is expensive and would further add to existing challenges to financially viability.

The Group therefore believe that the policy text needs to be substantially revised. Given the emergence of new spatial planning approaches to address energy requirements, for example the Local Area Energy Plans, the Group proposes that an area-wide approach is the more appropriate means by which to achieve the objective of the policy. The Group therefore looks forward to engaging with the City Council and the other Oxfordshire authorities in putting together such an area-wide approach across the county (or other appropriate strategic planning area).

Policy S4 - Plan Viability

The R19 Plan has set out a set of policies that if combined will lead to developers increasingly needing to engage with the City Council and undertake viability assessments under Policy S4. This is reflected in the conclusion of the Local Plan viability assessment (dated December 2025), which states that "*this inevitably comes with the downside of a higher volume of site-specific viability testing at the development management stage*".

Whilst the Group understands the City's objective for making policies aspirational this will have the effect of deterring investment in the City as it is not until late in the planning application process that any certainty will be gained on where the viability of a scheme will land (as per paragraph 59 of the NPPF). This applies more to sites that have already been purchased than new proposals that can take account of the requirements and decide whether to proceed or walk away. The City needs to balance having ambitious policies whilst also making the City an attractive location to invest.

The viability process will also slow up the decision-making process and delivery of development contrary to the overall aim of the NPPF to speed up delivery.

The Group therefore seeks amendments to the plan to reduce the onerous requirements of policies which together threaten viability. Policy S4 should include text which includes the ability to undertake a high-level viability assessment at the pre-application stage and then refine it once an application is submitted.

Plan Period

The proposed plan period is from 2022 to 2045, which increases on the 20-year plan period in the adopted Plan (2016-2036). There is an issue with the starting date for the period being 2022 given that it is 4 years before the submission of the plan and 4-5 years before its likely adoption date. The Group believe that the period of the plan should be adjusted to start in 2024 or 2025, which will maintain a 20-year plan period but is a more appropriate date given the timing of the submission and the date of the supporting evidence for the plan. The extension to the end date of the plan to 2045 is welcomed and reflects the Group's R18 representations.

Duty to Cooperate

Local planning authorities are currently bound by the statutory Duty to Co-operate (DtC) through the Localism Act 2011, when preparing or supporting the preparation of policies which address strategic matters including those policies of Local Plans. However, the statutory Duty to Cooperate will cease on 25 Mach 2026 under The Levelling Up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026). As a result of this, the DtC will not be a legal requirement at the time that this Local Plan is examined.

However, the assessment of the Local Plan must still meet the guidance set out in the NPPF. The Minister of State in his letter to the Chief Executive of the Planning Inspectorate dated 27th November 2025 regarding the abolishment of the Duty stated that "*LPAs should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and Inspectors should continue to examine plans in line*

with the policies in the NPPF on 'maintaining effective co-operation". As such the Group would expect to see continued cross boundary working – especially with respect to the delivery of Oxfords unmet need.

Conclusion

The publication of this version of the plan is commendable in the context of the relatively recent withdrawal of LP40. However, a number of the strategic issues that were apparent in the withdrawn plan persist in this emerging R19 Plan.

In that context, we trust that the above comments assist the further stages of the plan-making process. If you have any comments in relation to the above please do contact us.

Yours faithfully

[redacted]

David Jackson MA MRTPI

[redacted]

cc: Oxford Growth Group