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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: Francesca Parmenter

Organisation (if applicable): David Lock Associates Limited (on behalf of Hallam Land)

Address: [redacted]

Email: [redacted]

Date: 11 March 2026

**Data protection:**
Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2040 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2040 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

☑ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.

☐ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

| | Yes | No |
|---|---|---|
| **Do you wish to speak at the examination hearings?** (Please note that the Inspector will decide who to invite to speak) | ○ | ◉ |
| **Do you wish to be notified when:** | | |
| 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? | ◉ | ○ |

## GENERAL ADVICE

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
Oxford
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.

# DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

**Please read the accompanying notes before completing Part B.** The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

**Q1**. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

| | | | |
|---|---|---|---|
| Paragraph | | Policies Map | |
| Policy Number | Vision | Sustainability Appraisal | |

**Q2**. Do you consider that the document:

| | | |
|---|---|---|
| (a) is legally compliant? | ☐ Yes | ☐ No |
| (b) is sound? | ☐ Yes | ☐ No |
| | ☐ | ☐ |

**Q3**. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

| | | | |
|---|---|---|---|
| (a) positively prepared? | ☑ | (c) effective? | ☑ |
| (b) justified? | ☑ | (d) consistent with national policy? | ☐ |

**Q4**. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Hallam broadly supports the Local Plan Vision. However, the concerns raised through these and previous representations relate to the ability of the Local Plan, as drafted, to deliver on the Vision and Plan objectives, particularly in respect to addressing the housing and employment needs of the City – affordable housing being a central element of need that remains unmet and is growing.

The Plan, in this context, is not considered positively prepared nor justified and as such will not be effective. Fundamentally, the Plan will not meet its evidenced need – whether that is standard method derived or economic growth driven.

Lack of affordability undermines economic growth and prosperity and works against the Vision

*Please use an extra sheet if completing a paper copy.*

Hallam broadly supports the Local Plan Vision. However, the concerns raised through these and previous representations relate to the ability of the Local Plan, as drafted, to deliver on the Vision and Plan objectives, particularly in respect to addressing the housing and employment needs of the City – affordable housing being a central element of need that remains unmet and is growing.

The Plan, in this context, is not considered positively prepared nor justified and as such will not be effective. Fundamentally, the Plan will not meet its evidenced need – whether that is standard method derived or economic growth driven.

Lack of affordability undermines economic growth and prosperity and works against the Vision and objectives in respect to healthy and inclusive communities and equal opportunities for access to all basic needs to include homes, health, employment, nature and community infrastructure.

A Plan that does not deliver sufficient homes nor land for employment, whether that be within its own boundaries, or by securing a robust strategy through which needs can be met cross boundary, will not deliver on a Plan Vision that strives to achieve social inclusion and support communities that benefit from equal opportunities including as referenced – opportunities for access to housing.

**Q5**. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Hallam is not suggesting that the Council should water down its ambition. Indeed, the Vision should be appropriate to the City's prominence, influence and economic success; ensuring those qualities are strengthened and sustained and optimum outcomes for the economy, people and environment are achieved. The Plan must, therefore, further substantiate how the Vision and its objectives will be achieved, with a strategy and policies to deliver that, with an appropriately planned level of growth.

The Vision must be underpinned by clear strategy and policies to deliver growth to match needs – what can be achieved in Oxford and how it will continue to collaborate with neighbouring authorities to deal with unmet needs, particularly housing in a way that works spatially for Oxford to meet the Vision. The Vision is ambitious, however the Plan fails to provide an effective strategy to deliver this.

*Please use an extra sheet if completing a paper copy.*

**This is the end of the comment form**

# DETAILS OF YOUR COMMENT

Part B

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**Please read the accompanying notes before completing Part B.** The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

**Q1**. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

| | | | |
|---|---|---|---|
| Paragraph | | Policies Map | |
| Policy Number | SP1: Spatial Strategy | Sustainability Appraisal | |

**Q2**. Do you consider that the document:

| | | |
|---|---|---|
| (a) is legally compliant? | ○ Yes | ○ No |
| (b) is sound? | ○ Yes | ○ No |
| | ○ | ○ |

**Q3**. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

| | | | |
|---|---|---|---|
| (a) positively prepared? | ☑ | (c) effective? | ☑ |
| (b) justified? | ☑ | (d) consistent with national policy? | ☐ |

**Q4**. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Hallam considers that the Spatial Strategy proposed in Policy SP1 has not been positively prepared or is justified and as such will not be effective. As worded, the Spatial Strategy lacks a sufficient spatial expression as to where growth will be focussed - including Areas of Focus (currently omitted from the Strategy) where changes arising from new development over the plan period are expected.

Moreover, the Strategy lacks an indication on how it can and must collaborate with neighbouring authorities to address Oxford's issues that will continue to constrain the city's growth – unmet housing need being key. Although the Duty to Co-Operate is now withdrawn, neighbouring authorities have been requested to continue to collaborate across boundaries and maintain

*Please use an extra sheet if completing a paper copy.*

Policy SP1

Q4.

Hallam considers that the Spatial Strategy proposed in Policy SP1 has not been positively prepared or is justified and as such will not be effective. As worded, the Spatial Strategy lacks a sufficient spatial expression as to where growth will be focussed - including Areas of Focus (currently omitted from the Strategy) where changes arising from new development over the plan period are expected.

Moreover, the Strategy lacks an indication on how it can and must collaborate with neighbouring authorities to address Oxford's issues that will continue to constrain the city's growth – unmet housing need being key. Although the Duty to Co-Operate is now withdrawn, neighbouring authorities have been requested to continue to collaborate across boundaries and maintain effective co-operation on issues such as unmet housing need. (see letter from Matthew Pennycook, MHCLG, November 2025). As set out in our response to Infrastructure Areas and Areas of Focus, Hallam considers there to be significant scope for the Plan to demonstrate collaboration by identifying additional opportunities where future growth would spatially benefit the city – such as through an sustainable extension to Land North of Bayswater Brook allocation, Headington (Policy STRAT 13).

**Q5**. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

The Spatial Strategy must be able to express spatially where growth can be focussed. As the plan sets out Areas of Focus, this could be explicitly reflected in the Spatial Strategy. Furthermore, the plan should be bold enough to state that if growth ambitions are to be met in full, cross boundary collaboration will be necessary with neighbouring authorities to plan effectively. This must include:

• identifying additional Areas of Focus where opportunities for growth can be supported by cross-boundary expansion consistent with the approaches taken with Areas of Focus at the North Edge of Oxford and Cowley Branch Line - such as with a potential extension to Land North of Bayswater Brook (Policy STRAT13); and

• agreeing a mechanism through which Areas of Focus, linked to cross boundary growth, can be planned and delivered with neighbouring authorities.

*Please use an extra sheet if completing a paper copy.*

**This is the end of the comment form**

# DETAILS OF YOUR COMMENT

Part B

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**Q1**. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

| | | | |
|---|---|---|---|
| Paragraph | | Policies Map | |
| Policy Number | H1: Housing Require | Sustainability Appraisal | |

**Q2**. Do you consider that the document:

| | | |
|---|---|---|
| (a) is legally compliant? | ☐ Yes | ☐ No |
| (b) is sound? | ☐ Yes | ☐ No |
| | ☐ | ☐ |

**Q3**. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

| | | | |
|---|---|---|---|
| (a) positively prepared? | ☑ | (c) effective? | ☑ |
| (b) justified? | ☑ | (d) consistent with national policy? | ☐ |

**Q4**. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Hallam does not consider that this policy is positively prepared, justified and as such, will not be effective. It proposes a housing target based on the standard method calculation, and does not provide any strategy nor mechanism for how unmet need will be dealt with. The Plan confirms that there will be unmet need (in the order of 624 dwellings per annum) which is significant, with no resolution nor suggestion for how this might be remedied.

Hallam considers this to be a critical element omitted from the Plan strategy, not least because it undermines the ability to deliver much needed housing delivery, including affordable, but also supresses the ability to deliver on Oxfordshire's growth ambitions and reflect this with a robust housing requirement policy and strategy for delivery.

*Please use an extra sheet if completing a paper copy.*

H1 Housing Requirement

Q4.

Hallam does not consider that this policy is positively prepared, justified and as such, will not be effective. It proposes a housing target based on the standard method calculation, and does not provide any strategy nor mechanism for how unmet need will be dealt with. The Plan confirms that there will be unmet need (in the order of 624 dwellings per annum) which is significant, with no resolution nor suggestion for how this might be remedied.

Hallam considers this to be a critical element omitted from the Plan strategy, not least because it undermines the ability to deliver much needed housing delivery, including affordable, but also supresses the ability to deliver on Oxfordshire's growth ambitions and reflect this with a robust housing requirement policy and strategy for delivery.

Paragraph 1.1 of the Regulation 19 Background Paper 'Housing Need, Requirement and Mix' (Ref BGP 001) states that 'Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply.'

Hallam acknowledges that the housing requirement, informed by the standard method, is based on a capacity led approach. The standard method derived housing need across the Plan period is some 21,740 dwellings (calculated in December 2024 at 1,087 dwellings per annum) for 2025-2045. The calculation of Oxford's Capacity, for 2025-2045, as set out in Oxford's Strategic Housing Land Availability Assessment 2026 (January 2026) is 9,267 or 463 dwellings per annum. This provides for only 42.6% of local need as calculated by standard method.

Hallam Land does not support this approach. Although it follows on from efforts to secure higher growth in the Local Plan 2040, which failed at examination, it risks continuing to exacerbate a shortage in housing supply. This is not a positive or justified approach for the following reasons:

• The Oxfordshire Growth Commission (OCG) has recently made clear signals for a more ambitious approach. In its Interim Report, the OCG raises concerns that authorities are planning for significantly fewer homes than the minimum needed (by the new standard method). The OCG also considers that, in context of the economic ambitions for Oxfordshire and the Oxford-Cambridge corridor, “delivery above the new standard method will be required, as envisaged in paragraph 69 of the NPPF” (Oxfordshire Growth Commission, January 2026).

• Current provisions to meet unmet housing need – linked to the previous Housing Growth Deal - are not delivering as expected and, if relied upon, are unlikely to meet the full scale of Oxford’s unmet housing need, either as arising from the standard method or linked to the economic growth ambitions envisaged by the Oxfordshire Growth Commission.

• Despite previous commitments, the Interim Joint Statement of Common Ground (SoCG) agreed between Oxford and the neighbouring authorities on 30 January 2026, reveals that delivery of housing to meet Oxford’s unmet housing need has not been realised as planned under the Housing Growth Deal. Reliance on current provision, without agreeing further capacity for growth in neighbouring authorities, risks undermining the delivery of housing to meet Oxford’s unmet needs.

• Although the Duty to Co-operate no longer applies, it has been made clear 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.’’ (see letter from Matthew Pennycook, MHCLG, November 2025)

Without further collaboration to reach a revised agreement, supported by a clear joint delivery strategy, Hallam is concerned that housing delivery will continue to be limited and fail to meet Oxfords unmet housing needs.

**Q5**. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Hallam considers that the housing requirement must reflect a more ambitious approach that not only reflects the standard method but also the economic growth ambitions that will reflect the findings and approach suggested by the Oxfordshire Growth Commission.

The housing requirement must also be reflected with a positive and effective strategy for the delivery of housing. Whilst this will rely on the capacity identified through the SHLAA, it must also be able to reflect on close collaboration with the neighbouring Oxfordshire authorities to agree a cross-boundary strategy for housing delivery that can meet Oxfords unmet housing needs.

Further collaborative work to look at growth opportunities beyond its boundaries should be undertaken.

*Please use an extra sheet if completing a paper copy.*

**This is the end of the comment form**

# DETAILS OF YOUR COMMENT

Part B

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**Q1**. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

| | | | |
|---|---|---|---|
| Paragraph | | Policies Map | |
| Policy Number | E1: Addressing Empl | Sustainability Appraisal | |

**Q2**. Do you consider that the document:

| | | |
|---|---|---|
| (a) is legally compliant? | ☐ Yes | ☐ No |
| (b) is sound? | ☐ Yes | ☐ No |
| | ☐ | ☐ |

**Q3**. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

| | | | |
|---|---|---|---|
| (a) positively prepared? | ☑ | (c) effective? | ☑ |
| (b) justified? | ☑ | (d) consistent with national policy? | ☐ |

**Q4**. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Hallam does not support the proposed employment strategy. The proposed strategy, is not positive, justified and will not be effective, due to its failure to identify clear requirements for employment land and how or where needs will be met.

The policy is based on a criteria-based approach that seeks to focus and intensify development at existing employment sites and city and district centre locations whilst resisting development resulting in the loss of floorspace at key employment sites.

*Please use an extra sheet if completing a paper copy.*

**Q5**. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

The policy, based on a more positive and effective employment land strategy, is required. It should quantify employment land and floorspace requirements, express the spatial priorities where provision can be made and ensure flexibility for the market and growth in current and emerging sectors.

The approach for supporting employment growth must be aspirational and flexible and positively support and encourage the commitment and future investment into Oxfordshire that will be mobilised through the Oxfordshire Growth Commission.

The Local Plan, in looking forward to 2045, must create the conditions to support, not constrain economic growth. As stated in relation to housing requirement – collaborative working across boundaries is critical to securing and supporting this process.

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Part B

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**Q1**. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

| | | | |
|---|---|---|---|
| Paragraph | | Policies Map | |
| Policy Number | Infrastructure Areas | Sustainability Appraisal | |

**Q2**. Do you consider that the document:

| | | |
|---|---|---|
| (a) is legally compliant? | ☐ Yes | ☐ No |
| (b) is sound? | ☐ Yes | ☐ No |
| | ☐ | ☐ |

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|---|---|---|---|
| (a) positively prepared? | ☑ | (c) effective? | ☑ |
| (b) justified? | ☑ | (d) consistent with national policy? | ☐ |

**Q4**. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

The draft Plan proposes to co-ordinate development with the delivery of social, community and transport infrastructure across four 'Infrastructure Area' quadrants, within which there are 'Areas of Focus' – areas where changes are anticipated over the plan period resulting from new development at existing and proposed allocated sites - including development sites outside the city adjacent to the city's boundaries. The plan states that these are where a wider area consideration [through discussions and co-ordination with neighbouring authorities] will be needed to ensure success. They include:

1) North Edge of Oxford in the South Infrastructure Area, which adjoins Land East of Oxford Road (PR6a), Land West of Oxford Road (PR6b), and Land at Freize Farm (PR6c) in the

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Infrastructure Areas & Areas of Focus

Q4. The draft Plan proposes to co-ordinate development with the delivery of social, community and transport infrastructure across four 'Infrastructure Area' quadrants, within which there are 'Areas of Focus' – areas where changes are anticipated over the plan period resulting from new development at existing and proposed allocated sites - including development sites outside the city adjacent to the city's boundaries. The plan states that these are where a wider area consideration [through discussions and co-ordination with neighbouring authorities] will be needed to ensure success. They include:

1) North Edge of Oxford in the South Infrastructure Area, which adjoins Land East of Oxford Road (PR6a), Land West of Oxford Road (PR6b), and Land at Freize Farm (PR6c) in the Cherwell District.

2) The Cowley Branch Line, in the North Infrastructure Area, which adjoins Land South of Grenoble Road (Policy STRAT 11) and Land at Northfield (Policy STRAT 12) in the South Oxfordshire District.

Hallam considers that the draft Plan has failed to include similar opportunities that are evident within the East Infrastructure Area at Headington to build on the growth and regeneration benefits arising from development at Barton Park and strategic allocation at Land North of Bayswater Brook (STRAT13). At Headington, there is further growth potential such as through a sustainable extension to Land North of Bayswater Brook to support growth, regeneration and infrastructure delivery.

Headington is ideally placed at the edge of Oxford City and fosters strong relationships with key health and education and employment facilities at John Radcliffe Hospital, Oxford Brookes Headington Campus and University of Oxford Old Road Campus.

Proximity to Oxford and its sustainable transport modes is a key advantage of locating additional development at Headington/Bayswater Brook. The planned and proposed expanded strategic

growth at Headington directly facilitates the delivery of new sustainable transport modes into Oxford and physical transport improvements that have been sought in relation to the northern Oxford bypass and the transport infrastructure facilitating sustainable transport journeys relating to the Hospitals and Education facilities on the northern edge of Oxford at Headington/Bayswater Brook.

In this context, there is significant scope for wider consideration to be given to planned expansion and opportunities for further expansion – such as at Land North of Bayswater Brook.

**Q5**. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Hallam considers there to be scope for Headington/Bayswater Brook to become an additional Area of Focus within the Eastern Infrastructure Area given the current and potential levels of development and functional relationships with the John Radcliffe Hospital, Oxford Brookes Headington Campus and University of Oxford Old Road Campus.

Hallam is promoting land to the north and east of land North of Bayswater Brook - a clearly sustainable location, well connected to the city by sustainable transport links, on the Oxford City-A40 corridor, close to existing frequent bus services, capable of integrating into an existing pedestrian/cycle network and public transport improvements where investment is already made. The site could deliver a comprehensive form of development and play a key role in meeting Oxford's unmet housing needs, deliver elements of complementary employment and a mix of homes that could support the site's proximity to Oxford's hospitals and research facilities in the immediate area.

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| | | | |
|---|---|---|---|
| Paragraph | | Policies Map | |
| Policy Number | Evidence Base Studi | Sustainability Appraisal | |

**Q2**. Do you consider that the document:

| | | |
|---|---|---|
| (a) is legally compliant? | ☐ Yes | ☐ No |
| (b) is sound? | ☐ Yes | ☐ No |
| | ☐ | ☐ |

**Q3**. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

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| (a) positively prepared? | ☑ | (c) effective? | ☑ |
| (b) justified? | ☑ | (d) consistent with national policy? | ☐ |

**Q4**. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Hallam considers that the evidence-based studies being undertaken to support the preparation of the plan are not positive or justified in being too restrictive, in focusing only on the geography of Oxford.

Whilst the evidence base includes Oxford Green Belt Additional Site Assessments, this only serves to clarify the limited and constrained opportunities for the city to accommodate additional housing and fails to consider the possible opportunities for expansion that could be explored collaboratively with neighbouring authorities.

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**Q5**. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

In order to assist collaboration with neighbouring authorities, evidence based studies such as Green Belt assessment must be broadened to become, or be supported with, joint strategic studies with the neighbouring authorities, none more so than to undertake a strategic review of the Oxfordshire Green Belt – a critical step that is necessary if the city's unmet need is to be met whilst promoting sustainable patterns of development.

Further collaborative work to look at growth opportunities beyond its boundaries should be undertaken.

*Please use an extra sheet if completing a paper copy.*

**This is the end of the comment form**