Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Christina Cherry

Organisation (if applicable): Cherwell District Council

Address: [redacted]

Email:

Date:

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 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 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		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.

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.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Place and Regeneration

Ian Boll, Executive Director

Cherwell DISTRICT COUNCIL NORTH OXFORDSHIRE

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Our Ref: PP/General/Oxford City

13 March 2026

Dear Rachel,

Oxford Local Plan 2045 Regulation 19 Consultation – Officer Response

Thank you for the opportunity to comment on the Regulation 19 stage of the Oxford Local Plan 2045 (OLP 2045).

This officer response focuses on matters of strategic importance to Cherwell District Council. We trust that they can be taken forward constructively as part of the plan preparation process through Duty to Cooperate meetings and our ongoing officers' liaison between our two authorities. We would also wish to record the high level of cooperation between our two Councils on strategic planning matters. May I also thank you for your attendance at the first stage of our Local Plan hearings. It was helpful to hear your evidence.

Housing need and requirement

We note that your proposed Plan period is 2025 to 2045. We note the proposed overall housing requirement of your Plan and take no issue with it.

On 31 October 2025, your Chief Executive wrote to our Chief Executive advising that the housing need of Oxford was 1,087 homes per annum from 2025 to 2045. The letter highlighted that, based on the application of the Standard Method, Oxford's total housing need was 21,740 Homes. At that time, we were advised that your housing capacity was 8,202 homes and that unmet need would then be 13,538 homes (2025-45).

Your Proposed Submission Plan (Regulation 19) confirms that your housing need is 1,087 homes per annum from 2025 to 2045 (a total of 21,740) and provides an updated capacity position. Chapter 2 (page 2) states:

'*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. However, 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*.'

Policy H1 of your Plan therefore proposes a capacity-based housing requirement of 9,267 from 2025 to 2045.

Having considered the conclusions of your Local Plan Examination in 2024, and the specific observations of your (then) Local Plan Inspectors on housing need, we would agree with your application of the Standard Method. We note that the calculation of Local Housing Need (LHN) is a forward-looking assessment. From the point at which LHN is calculated it takes account of what has happened in previous years.

We also welcome the fact that your total housing capacity has increased to 9,267 homes from 8,202 in October 2025. In that context we do not take issue with your conclusion on capacity and note that there is a remaining unmet need for 12,473 homes (21,740 – 9,267).

The Oxfordshire rural district councils previously committed to providing 14,300 homes to meeting Oxford's unmet housing need. This commitment was embedded in adopted Local Plans.

The Statement of Common Ground (30 January 2026) for your Local Plan, signed by all the city and district Councils, highlights what has been completed so far: Cherwell: 0; South Oxfordshire: 0; Vale of White Horse 1420; and West Oxfordshire – 237. This is a total of 1657 homes (i.e. 1420 + 237).

This means that of the commitment of 14,300, there remains a total of at least 12,643 homes to meet unmet need (14,300 – 1,657). That is greater than the City's unmet need of 12,473.

On that basis, there is no residual need for the four rural districts to meet over their existing commitments to 2045, subject to those commitments being met.

The submitted Cherwell Local Plan which is under Examination proposes to provide 4,400 homes for Oxford and to deliver these by 2042; that is before the end of your Plan period. Specific site policies are proposed to be saved to deliver this. At the time of writing, all but one of those sites has progressed significantly through the development management process. You heard at our Local Plan hearings that we are prepared to make policy wording modifications to make the 4,400 explicit within our housing requirement policy should our Inspectors invite us to do so and to ensure the close monitoring of delivery.

SHLAA

Your conclusions on capacity are informed by your latest SHLAA. We note that it broadly follows national guidance and we understand that new evidence has influenced individual site assessments. Our main observation is that your overall capacity (and delivery) should not fall below your assumed figure of 9,267 homes (2025-2045). We note the application of a 10% non-implementation factor and that a general density multiplier of 100 dph has been applied to development typologies in the city and district centres. These are indicative and there may be opportunities for higher density development beyond the 100 dph in a relatively compact city such as Oxford with good public transport. We are also cognisant that further potential may arise from mixed use development on employment sites and within your part of the Green Belt, for example to deliver affordable housing.

Employment need

Policy E1: Employment Strategy indicates that the new employment generating uses will be acceptable on existing employment sites in the city and district centres. It conditionally provides for employment generating development outside of these locations. We welcome the proposal to allow, in principle, the development of housing on employment sites in particular circumstances. However, we consider that the policy would benefit from greater clarity in the interest of usability and to ensure that appropriate opportunities are

not overlooked.

The Plan states that B8 uses are not regarded as the most appropriate use within the City and suggests that these uses will only be supported where it is essential to support the ongoing operation of larger employment sites. This approach, set out in Policy E2: Warehousing, Storage and Distribution Uses, should, in our view, be more flexible to sustainably support logistics operations within the city boundary to meet Oxford's needs.

Employment Land Needs Assessment (ELNA)

The publication of a final ELNA is noted and the further exploration of a Functional Employment Market Area (FEMA) and the principle of a County-wide FEMA is supported.

It should be noted, for accuracy, that in Table 2.1 of the ELNA the period which is covered by Cherwell's ENA is 2020-2042, rather than 2021-2042.

The lack of housing and public transport had previously been highlighted in the earlier draft version of the ELNA as a constraint to economic growth with recognition that many of the City's employees travel in from neighbouring authorities. In our view, this pattern will be exacerbated, and commuting will increase unless significant residential development is delivered within the City and land suitable for housing development is not unreasonably lost for employment purposes.

The updated ELNA now recognizes the very large pipeline of Research and Development space in the City, and that its development in advance of housing delivery will likely impact commuting flows. It is also noted that the ELNA states that the planned re-opening of the Cowley Branch Line to passenger services and East West Rail will potentially ease any constraint to economic growth.

At paragraph 5.60 of the ELNA, the assessment suggests that industrial/warehousing space is accommodated outside the City and refers to locations within Cherwell District. It is not clear whether you are indicating that your warehousing need is being met by these locations but we anticipate that policy E2 will address this.

Areas of Focus

It is noted that the Northern Edge of Oxford Area of Focus within the Plan refers to land within Cherwell District. We would welcome greater clarity on the sites within Cherwell district which are allocated in the Cherwell Local Plan Partial Review to meet Oxford's housing needs, (PR6a, PR6b, PR7a, PR7b, PR8 and PR9). A correction is also needed to your supporting paragraph prior to Policy NEOAOF - as site PR6c (Land at Frieze Farm) is not a housing site and reserved only for the potential construction of a golf course should this be required as a result of the residential development of Land to the West of Oxford Road under Policy PR6b (North Oxford Golf Course).

We also request an addition to the policy which would be in both Cherwell's and Oxford's interests in meeting Oxford's housing needs. A policy requirement criterion should be added to make clear that any development within the Area of Focus will be expected to support (and not undermine) the delivery of nearby sites PR6a, PR6b, PR7a and PR7b and not delay their delivery in meeting Oxford's housing needs.

Open space, recreation and playing pitches

It is not clear how the assessment of open space, recreation and playing pitches needs within the City has been used to inform the assessment of sites in the HELAA 2026 and the allocation of sites in the OLP 2045. Further clarity may be helpful.

We note that there is no evidence on golf needs in the City's Playing Pitch Strategy Interim Report 2026. It is important that this gap in the evidence is addressed considering the allocation of the North Oxford Golf Couse by Cherwell for housing development and the

reservation of Frieze Farm for an alternative golfing facility should this be required to meet need.

Green Belt

The Green Belt assessment of additional sites 2025 carried out by LUC and published alongside the consultation focusses on whether any of the previously assessed sites meet the criteria for 'grey belt'. The starting point for this study appears to be the earlier work, also undertaken by LUC.

We would just wish to highlight that there might be other opportunities with your area of the Green Belt (e,g to provide affordable housing). Bearing in mind the development pressure on adjoining authorities, it would be helpful if the circumstances in which Oxford would consider meeting its development needs within its parts of the Green Belt could be clearly set out.

General comments

We would welcome a clear table with the number of homes to be delivered and when. The capacity-based context of the OLP should also be explained within the Local Plan, including delivery of the housing requirement and the housing trajectory.

We hope you find the above comments constructive. We consider they are matters that could be resolved as your Plan progresses to submission and through Examination. We look forward to further engagement in due course and would wish to have the opportunity to appear at your Local Plan hearings.

Yours sincerely,



David Peckford
Assistant Director – Planning and Development