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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: Chris Hargraves

Organisation (if applicable): West Oxfordshire District Council

Address: [redacted]

Email: [redacted]

Date: 12/03/26

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
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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 see separate letter

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 see separate letter

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Andrew Thomson

[redacted]

[redacted]

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BY EMAIL ONLY

12 March 2026

Oxford Local Plan 2045 – Regulation 19 submission draft

Thank you for the opportunity to make representations on the Regulation 19 submission draft Oxford Local Plan.

We have engaged with Oxford City Council throughout the Plan making process to date, providing representations to Reg 18 consultation and through previous iterations of the Local Plan and at Examination.

We have previously offered support for the overall structure, content and wording of the emerging draft plan which we found to be clear, accessible and easy to follow. We note in the Regulation 19 submission draft version that the amount of supporting text has been minimised and put largely into bullet point form which is supported.

As a general observation, it would be helpful if the draft contents page could be expanded so that it is clear from the outset not only which general chapters are included in the plan, but also which policies fall under each of those chapters. This would aid navigation of the document for the reader.

Plan Period

We note that the plan period is now intended to be the 20-year period 2025 – 2045. We are supportive of this insofar as it will ensure a period of at least 15-years from the date of adoption and, with particular regard to the housing requirement, aligns with our own emerging Local Plan which has a base date of 1st April 2025.

This is helpful in terms of any consideration of unmet housing need arising from the capacity-based housing requirement set out in Policy H1 (see further comments below).

It does however increase the overall quantum of unmet housing need to plan for in other areas which has practical implications for other local plans such as West Oxfordshire where the plan periods do not fully align – our emerging plan having an end date of 2043 for example.

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

Whilst generally supportive of Policy S1, we suggest that the Local Plan should avoid unnecessary repetition of national policy regarding the presumption in favour of sustainable development. This will also avoid Policy S1 becoming quickly out-of-date against the new NPPF when published.

We also have concerns that Policy S1 does not explicitly reference the importance of maximising the delivery of new homes in suitable and sustainable locations. Given the housing land supply constraints facing Oxford and the capacity-based housing requirement which is proposed, it is essential that the overall spatial strategy includes an explicit commitment to maximising the delivery of new homes within Oxford's administrative boundaries.

Whilst the repetition with the NPPF is a presentational rather than soundness issue, we consider that the absence of clear commitment to maximising housing delivery does present a soundness concern – particularly given that the draft plan's reliance on a capacity-based housing requirement.

Policy S3 – Infrastructure Delivery in New Development

Again, whilst supporting the general purpose and intent of this policy, we have previously raised concerns that it lacked sufficient emphasis on development phasing. We note that there is now considerable emphasis on the importance of appropriate phasing and this is strongly supported.

We remain of the view that it would not be unreasonable for the City Council to require an individual Infrastructure Delivery Plan or statement for larger development proposals but do not necessarily consider this to be an issue of soundness.

Policy H1 – Housing Requirement

The City Council's decision to revert to the Government's standard method for assessing housing need is supported by WODC. The standard method calculation results in a per annum need of 1,087 dwellings for Oxford and we note the intention to apply this over the 20-year period 1st April 2025 – 31st March 2045 which is also strongly supported.

We note that Policy H1 retains a capacity-based approach to establishing a housing requirement. Whilst we have no concerns with this in principle, we do note that the per annum housing supply assumptions have fallen from 481 homes per year in the, now withdrawn, draft Local Plan 2040, to 463 homes per year in the Regulation 19 draft Local Plan 2045.

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Whilst we agree in principle with the approach taken towards establishing housing need, given that a housing capacity-based requirement is proposed, the supporting text should be expanded to make the position on overall need, assumed supply (including why this has fallen) and in turn, 'unmet' housing need much clearer.

In particular, the text should clearly explain that the overall level of housing need for Oxford City in the period 2025 – 2045 is 21,740 dwellings (i.e. 1,087 x 20 years) and that the assumed level of housing supply is 9,267 dwellings, thereby resulting in an unmet housing need of 12,473 in the period 2025 – 2045.

It would be helpful to further explain that this assumed level of unmet need is lower than that previously identified for the period 2011 – 2031 (working assumption of c. 15,000 homes) and that it will need to be accommodated outside of Oxford in appropriate and sustainable locations.

Whilst we appreciate that the examiner will be considering the soundness of Oxford's Local Plan only, given the implications for adjoining Districts including West Oxfordshire, it is essential that the Oxford Local Plan is unequivocal in terms of the quantum of unmet need that is considered to exist and over what period this applies.

It would also be helpful if the plan were to reference the provision previously made for Oxford's unmet housing need in adopted local plans such as Salt Cross Garden Village and a proportion of the West Eynsham SDA in West Oxfordshire.

Whilst this is currently addressed to an extent in Policy H1 and the supporting text, it should be made much clearer. This clarity could be achieved through some simple text adjustments and additions.

Policy H2 – Delivering Affordable Homes

Whilst we are largely supportive of the proposed approach to delivering affordable housing, including the priority being given to social rented tenures, we note the reference to the provision of 'genuinely affordable' housing and would simply observe that there is no such definition within the NPPF.

This was an issue of concern raised by the original Inspector examining the Salt Cross Area Action Plan (AAP) and a Main Modification was required to take similar phraseology out of the document.

Whilst we fully appreciate that some affordable housing tenures may not be 'affordable' in the Oxford context, Policy H2 would benefit from 'sharpening up' by using the established definitions of affordable housing only.

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Other Housing Related Policies

We have reviewed the remaining housing policies H3 – H14 and have no soundness concerns. As an observation, in relation to Policy H13 on self-build housing, we note the requirement for larger residential schemes of 100 homes or more to provide 5% self-build which is a common approach taken by many local authorities including West Oxfordshire.

It does however raise the question of how many residential schemes of that size are likely to come forward in Oxford given the constrained nature of housing supply and in turn, whether a lower trigger should be considered (e.g. 25 dwellings).

The supporting text references the importance of avoiding adverse impacts on design and layout but it is not clear how the introduction of a lower trigger would necessarily be harmful.

There is also the practical issue of self-build delivery in flatted schemes which presumably make up a large proportion of housing supply in the City. This could usefully be expanded upon in the supporting text.

Policy E1 – Employment Strategy

We welcome the clarity provided by Policy E1 in relation to the overall need for employment space in the period 2025 – 2045 at 412,460 sqm. We note that most of the need is for R&D uses (345,004 sqm).

We note and welcome the clear commitment to meeting all identified employment needs within the City in the period to 2045. This is strongly supported.

We also note the approach proposed regarding the potential for new homes to come forward on key employment sites and other existing employment sites which is also welcome in principle. The additional clarity provided in the draft policy is supported. Finally, we note the acknowledgement provided that additional intensification of employment uses has the potential to draw additional workers into the City which is an issue we have previously highlighted through earlier representations.

Policy E3 – Community Employment and Procurement Plans

We strongly support Policy E3 including the requirement for larger residential and non-residential schemes to be accompanied by a CEPP covering both the construction and end-user/operational phase.

We also welcome the fact that smaller proposals will also be required to submit a supporting statement demonstrating how local job opportunities and skills training have been considered.

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Policy G2 – Enhancement and Provision of New Green and Blue Features

We note that Policy G2 does not include any quantitative GI standards/development requirements. Whilst the Oxford Local Plan will be examined under the December 2024 version of the NPPF, the emerging draft version of the Framework places a strong emphasis on setting local standards with reference where appropriate to national benchmarks.

Whilst not an issue of soundness for Policy G2, additional clarity around any GI standards to be applied to new development would be helpful – not least because of the urban setting of most development and the inter-relationship with issues of density and making the most efficient use of land etc.

Policy R1 – Net Zero Buildings in Operation

We strongly support this policy and welcome the fact it has been included in the Regulation 19 draft plan, notwithstanding the unfortunate direction of travel suggested by the emerging draft NPPF.

West Oxfordshire District Council has formally adopted the Salt Cross Area Action Plan (AAP) which includes a similar net zero policy incorporating the use of energy-based metrics including space heating and energy use intensity targets.

The formal adoption of the AAP demonstrates that an energy-based approach to net zero can be found to be consistent with national policy as well as being deliverable and viable and we commend the approach being taken by the City Council in this respect.
We also remain strongly supportive of the related policies regarding embodied carbon and retro-fitting.

Policy R5 – Water Resources and Quality

We note that Policy R5 adopts the optional building regulations standard of 110 litres per person per day. Whilst not an issue of soundness, we are disappointed that the City Council has not taken the opportunity to go further than this given that the County falls within a defined area of significant water stress.

We would observe that the Government consulted on proposals to bring this optional standard down from 110 litres per person per day to 100 litres per person per day in September 2025 and whilst the outcome of that consultation is still awaited, it represents a clear direction of travel.

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Policy HD11 – Accessible and Adaptable Homes

We note and welcome the City Council's requirement for a proportion of new market homes on larger schemes of 10+ units to be built to Part M4(2) accessibility standards and 5% to Part M4(3) wheelchair user standards in properties for which the City Council would be responsible for allocations or nominations.

Again, whilst we have no concerns on the soundness of the approach taken, we note that in the Government's recent consultation on the new draft NPPF, there is a suggestion that local authorities should be aiming to achieve at least 40% of all new housing to Part M4(2) or M4(3) standards.

The impact on deliverability and viability of achieving Part M4(2) in particular is minimal and we would strongly encourage the City Council to set a more ambitious requirement.

Summary

In summary, we welcome the opportunity to comment on the Regulation 19 submission draft plan and support much of the content.

Any issues flagged in the response above are largely minor and could easily be addressed through some minor proposed changes to the plan prior to submission for independent examination.

The one area where we do have some soundness concerns relates to the current lack of clarity around the housing need and requirement over the plan period, the assumed level of supply and, in turn, the level of unmet need arising.

Whilst the information is there and can be deduced, some clearer wording in Policy H1 and the supporting text is vital. Further commitment in Policy S1 towards maximising the delivery of new homes in suitable, sustainable locations is also essential.

I would be grateful if you could keep us advised on next steps including the timing of submission and examination. Please note that we would wish to take part in any examination hearing sessions where these relate to the overall strategy and housing requirement in particular.

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I hope the above response is helpful but do please let me know if you need any further information or clarification over any of the points raised.

Yours sincerely

[redacted]

Andrew Thomson
[redacted]