

Oxford Local Plan 2045

Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name:

Organisation (if applicable):

Address:

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.

Do you wish to speak at the examination hearings?

(Please note that the Inspector will decide who to invite to speak)

Yes ☐ No ☐

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 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.

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

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 not: (tick as appropriate)

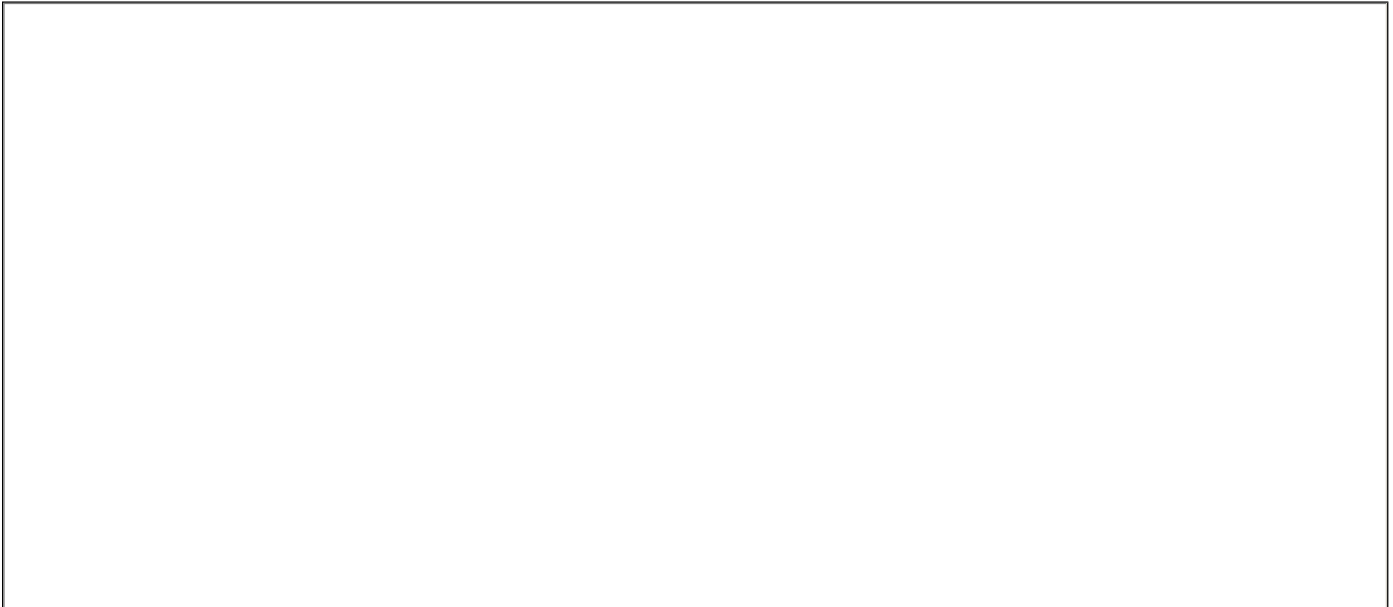
(a) positively prepared?	☐	(c) effective?
(b) justified?		(d) consistent with national policy?

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.

[84.1 - Policy H1 - Proposed change](#)



Please use an extra sheet if completing a paper copy.

This is the end of the comment form

x.84.1 - Policy H1 - Unsound - Unjustified, not legally compliant with DtC

1. Nurton Developments (Didcot) Ltd (NDDL) considers that Policy H1 of the Oxford Local Plan 2045 Submission Draft is unsound because it is not justified and it is not based on maintaining effective co-operation. Furthermore, while the Duty to Co-operate remains in force, it is not legally compliant.
2. Policy H1 does not meet the Local Housing Need in full. The Local Plan is reliant on the co-operation of adjoining local authorities to provide housing to meet unmet need. NDDL has identified some areas of serious concern as to the clarity of how unmet need is to be provided for across plan periods and contends that Policy H1 is not supported by a clear understanding of how unmet needs will be met.
3. NDDL responded to Regulation 18 consultation on the Oxford Local Plan, seeking clarification as to how the housing figures from the existing Oxford Local Plan and the extant Local Plans for neighbouring local authorities relate to the housing requirement over the new plan period. It was unclear why the start date for the plan period had been chosen and what this meant for housing to meet unmet needs being attributed from the adopted Local Plans of neighbouring authorities.
4. Paragraph 5.11 of background paper 001 to the current consultation confirms that:

"The Interim Statement of Common Ground provides details on the commitments towards Oxford's unmet need in the adopted and emerging plans of neighbouring districts (as of January 2026). This confirms that Oxford has calculated the level of unmet need for the period 2025-2045 to be: 12,373 homes; that all the Oxfordshire authorities have in combination made provision for 14,300 homes in their currently adopted Local Plans; and that they plan to continue to provide for Oxford's unmet need in their emerging Local Plans (the emerging Plans of Cherwell, South Oxfordshire, Vale of White Horse are currently at examination and West Oxfordshire has recently published a Regulation 18 consultation document). This gives the City Council confidence that our identified unmet need can be met".
5. Paragraph 5.10 states that the conversation regarding unmet need *"is ongoing and has enabled an Interim Joint Statement of Common Ground to be published on the matter as part of the Regulation 19 consultation material, with the intention of publishing a detailed Memorandum of Understanding at the submission of the Oxford Local Plan"*. The Interim Joint Statement of Common Ground is not amongst the papers supporting the current consultation and therefore the situation is opaque as to how housing provision in adopted Local Plans contributes towards meeting unmet needs over the plan period.
6. Paragraph 5.11 seems to suggest that the neighbouring authorities have already provided for unmet need. However, the figure of 14,300 includes provision from neighbouring authorities from 2011 (i.e. before the Oxford Local Plan period 2025-2045 commences) and was agreed in the adopted Oxford Local Plan 2036 to meet the city's unmet needs from 2011-2031. The agreed provisions are as follows: -
 - Cherwell (2011 – 2031) – 4,400
 - South Oxfordshire (2011 to 2035) – 4,950

- Vale of White Horse (2011 to 2031) – 2,200
 - West Oxfordshire (2011 – 2031) – 2,750
7. As an illustration, if these were delivered on a straight-line trajectory, the figures from 2025 (i.e. the start of the new Oxford Local Plan) would be as follows: -
- Cherwell (2025-2031) – 1,320
 - South Oxfordshire (2025-2035) – 2,063
 - Vale of White Horse (2025-2031) - 660
 - West Oxfordshire (2025-2031) - 825
8. This totals 4,868, which would leave a remaining unmet need of 7,605 homes to cover the period up to 2045. However, it is unclear to what extent housing provision in adjoining local authorities has been attributed towards meeting unmet needs prior to 2025, and what remains planned to meet needs to 2045. It seems that the same overall provision of 14,300 dwellings is being stretched across two plan periods from 2011-2045.
9. In conclusion, NDDL considers that, from the available information, it is not clear that provision in adopted Local Plans has covered unmet need for the plan period. It is apparent that there could be a substantial shortfall to meeting unmet needs and, therefore, Policy H1 is neither clearly justified nor based on maintaining effective co-operation. As it stands, Policy H1 is not legally compliant as it fails the Duty to Cooperate by being based on an opaque situation as regards how unmet need is attributed from adopted Local Plans across plan periods.

For further information please contact:

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Director



[Redacted contact information]

www.chaveplanning.com