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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: Matthew Jones

Organisation (if applicable): Gladman Land and Developments

Address: [redacted]

Email: [redacted]

Date: 12/03/2026

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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.

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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?	◉	○

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.

GLADMAN

Oxford City Council
Local Plan

Regulation 19 Consultation

March 2026

gladman.co.uk | 01260 288888

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1 INTRODUCTION

1.1 Context

1.1.1 Gladman Developments Ltd. (Gladman) welcome the opportunity to comment on the Oxford City Council Local Plan (OCLP) Regulation 19 consultation, and request to be updated on any future consultations and the progress of the Local Plan.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

1.1.3 The sections that follow include specific comments from Gladman on the Council's submission draft Local Plan covering a range of topics.

2 NATIONAL PLANNING GUIDANCE

2.1 National Planning Policy Framework

2.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The NPPF requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

2.1.2 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.1.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

2.2 Written Ministerial Statement

2.2.1 The need to plan for the sufficient delivery of homes is affirmed in the Written Ministerial Statement (WMS) given by the then Deputy Prime Minister, and Secretary of State for Housing, Communities and Local Government, Angela Rayner on 30th July 2024.

2.2.2 The WMS reaffirms that the country is in "*the most acute housing crisis in living memory*" and is clear in its conclusion that "*there is no time to waste. It is time to get on with building 1.5 million homes*". These are now material considerations for plan making and decision making and clearly set the tone and direction of the newly elected Government.fchel

2.2.3 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Oxford City Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.

3 LEGAL COMPLIANCE

3.1 Sustainability Appraisal

3.1.1 It is arguable that the Sustainability Appraisal's (SA) Options have not had due consideration when the role of Oxford is taken into account in terms of its importance

to the economy. This role is confirmed in the Employment Land Needs Assessment (ELNA), yet the LPA has elected for Option B when considering the Housing Requirement following the SA process.

3.1.2 Given the importance of Oxford to the economy as outlined in the ELNA, it is curious that Option C was not given more consideration, as it gives greater acknowledgement of the requirement to grow beyond the LPA borders after confirming the economic significance of the settlement and surrounding area. Option C allows for a housing requirement higher than the standard method, to allow for stronger support for economic growth or affordable housing need, whilst recognising the necessity for this growth to be supported by the surrounding areas.

4 DUTY TO COOPERATE

4.1.1 The Duty to Co-operate (DtC), as a legal test, was rescinded by the Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023, meaning local authorities are no longer legally required to cooperate with neighbouring authorities on strategic planning matters. Within Matthew Pennycook's Written Ministerial Statement from 27th November 2025, it was confirmed that the Duty to cooperate would not continue. However, engagement with prescribed bodies on relevant strategic and cross boundary matters remains an important part of the plan-making process. The need to maintain cooperation on cross boundary matters is set out within National Policy.

4.1.2 It is important for the councils to demonstrate how it has engaged constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of the OCLP preparation.

4.1.3 NPPF paragraphs 24–28 emphasise the need for local planning authorities to maintain effective cooperation during the plan-making process. It provides that this is integral to the production of a sound plan, one that is positively prepared and with a justified strategy for managing growth and meeting identified needs for development, including infrastructure. Cooperation can help to inform considerations as to whether

development needs that cannot be met wholly within a particular plan area could be met elsewhere.

4.1.4 While the legal duty to co-operate will therefore not apply to this local plan, this does not remove the requirement in the NPPF that in order to be considered sound a local plan must be "*based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground*". The only difference arising from the removal of the duty is that a failure to co-operate effectively is a soundness matter.

4.1.5 Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process[1]. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

4.1.6 Gladman notes that efforts have been made to ensure that there has been constructive engagement with neighbouring authorities during the plan-making process. There have been clear attempts to engage, specifically with the Oxford Leaders Joint Committee (OLJC) on a 2-monthly basis. The OJLC consists of Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council, West Oxfordshire District Council and Oxfordshire County Council.

4.1.7 However, upon researching through the council's web pages, it is very difficult to navigate and find anything of real note that shows how the council has worked with its neighbours and relevant bodies on strategic cross-boundary matters. It is unclear the level of attendance in such meetings, the levels of discussion or what conclusions were made between those attending.

[1] PPG Reference ID: 61-001-20180913

4.1.8 The Duty to Cooperate element is particularly pertinent for the Oxford local plan given the reasoning behind the Oxford 2040 local plan being withdrawn. It is noted that a principal reason for the previous plan's failure, whereby the inspectors expressed 'substantial concern,' was the lack of cooperation surrounding the commissioning of the Housing and Economic Needs Assessment (HENA).

4.1.9 In light of this, it is unusual that the council has not made it unmistakably clear that they have indeed acted in accordance with the NPPF in relation to effective joint-working, and likewise made it certain with clear evidence that this has been undertaken.

4.1.10 If it cannot be fully demonstrated that the council has cooperated effectively then the draft local plan must be deemed unsound.

Statements of Common Ground

4.1.11 There is a Joint Interim Statement of Common Ground (SoCG) between Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council, West Oxfordshire District Council, dated 30th January 2026. This document is signed by all parties/LPAs.

4.1.12 It is noted that all authorities agree that housing need, housing supply and unmet need of housing is a strategic matter and is a focus of the Joint Interim SoCG. It is clear that the Councils still have a number of matters to address, in which a number of Councils are requesting additional evidence. There is no conclusion on the un-met need and how this is to be met.

5 HOUSING REQUIREMENT AND UNMET NEED

5.1.1 While Gladman support the use of the standard method, further consideration should be given to a higher housing needs figure to support economic growth within Oxford. Oxford has been identified as a key location for economic growth nationally. The housing needs figure to support economic growth within the region may be higher than that of the Standard Method.

5.1.2 It is confirmed in the Regulation 19 document (January 2026) that Oxford's housing need over the plan period is 21,740 dwellings, or 1,087 dpa. However, it is confirmed in Oxford's Strategic Housing Land Availability Assessment (2026) that the LPA only has capacity for 9,267 homes over the plan period, equating to 463 dpa. Policy H1 outlines that a provision of 9,267 is therefore made within the emerging OCLP. Policy H1 does not outline what the un-met need is and how this is to be met. On the basis of a housing requirement of 9,267, there is a shortfall of 12,473 dwellings over 20 years, or 624 dpa.

5.1.3 It is noted that these figures differ slightly from the letters issued to the neighbouring authorities regarding unmet need, with these letters dated October 2025. Given that the Regulation-19 numbers are more recent, these will be the numbers subject to this consultation response.

5.1.4 The Oxfordshire authorities entered into a Memorandum of Co-operation undated (MoC), which dealt with the un-met need that arose from the Oxfordshire SHMA 2014. The MoC dealt with the period between 2021-2031 and set out an apportionment of housing between the 5 Oxfordshire authorities. This has not been repeated in the same way through this plan making process.

5.1.5 The aforementioned Joint Interim SoCG (January 2026) outlines how the Oxfordshire LPAs are currently dealing with unmet need:

a. Cherwell adopted Local Plan makes provision for 4,400 dwellings to be delivered between 2021 and 2031. The Cherwell submitted local plan rolls forward the previous commitment of 4,400 but for the plan period 2020-2042.

b. South Oxfordshire District makes provision for 4,950 dwellings but only between 2021-2036. This provision is within South Oxfordshire's adopted plan and emerging local plan.

c. Vale of White Horse makes provision for 2,200 within the adopted plan between 2019-2031 and 1,830 dwellings between 2021-2031 within the emerging Local plan.

d. West Oxfordshire District made provision for 2,750 dwellings between 2021-2031, and proposed 10% uplift in supply to accommodate Oxford's un-met need. However, without a commitment from West Oxfordshire on a number in the emerging Local Plan, it is unclear what number West Oxfordshire is bringing forward to meet Oxford City's un-met need.

5.1.6 Unfortunately, to consider that the unmet need will be fully incorporated into adjoining local authorities is fundamentally misconceived. The figures identified within the Joint Interim SoCG are the same (with the exception of Vale of White Horse due to a change in period covered), are those previously agreed in the MoC covering a period 2021-2031 (or 2021- 2036 in South Oxfordshire case). The new housing needs figure covers the period 2025-2045. Therefore, the previous agreed figures also include homes that deal with un-met for 2021-2025. This must be taken into account when considering how the un-met need is met.

5.1.7 Notwithstanding the above, when combining the confirmed figures, (4,400 + 4,950 +1,830) gives a total of 11,180 agreed dwellings to be met in the adjacent authorities (excluding the unknown figure for West Oxfordshire). Oxford's unmet need for the plan period is calculated as being 12,473 dwellings, meaning a shortfall of 1,293 units despite the above contributions from the neighbouring authorities. This shortfall, using Oxford's delivery of 463 dpa, equates to a minimum of 2.8 years of unmet need.

5.1.8 Oxford City must clarify where the un-met need is to be met and how. Through the plan and the Joint Interim SoCG it is not clear how this will be done. In addition to this in some cases none of the previously agreed un-met need (as per MoC) has been delivered on the identified sites within the Joint Interim SoCG, therefore consideration should be given to the deliverability of the un-met need on these sites.

5.1.9 Oxford City must ensure that it is abundantly clear where the un-met need is to be delivered and be clear on mechanisms to meet this. All of the Oxfordshire authorities have high housing needs themselves and therefore the sites to meet the un-met need should be identified clearly. With the case of West Oxfordshire, the sites identified within West Oxfordshire for the previously agreed unmet need have started to deliver, however none of the affordable element has gone to those on the Oxford City waiting

list (Joint Interim SoCG paragraph 30), this must be considered where this site is truly meeting Oxford City's un-met need.

5.1.10 Within the regulation 19 draft of the OCLP it is not clear what the un-met need is and how this is to be met. Gladman do not consider that the plan can be found sound on this basis.

6 CONCLUSIONS

6.1 Summary

6.1.1 Gladman welcomes the opportunity to comment on the Oxford Local Plan Submission Draft. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2024) and the associated updates that were made to Planning Practice Guidance.

6.1.2 Previous plans in Oxford have been withdrawn due to a failure to adhere to the Duty to Cooperate. Whilst this was rescinded as part of the 2023 amendments to the NPPF, there is still a requirement for local authorities to undertake effective joint working. As above, it is unclear whether this is the case, and to ensure that the draft plan can proceed without any soundness issues it must be entirely unambiguous in respect of all/any cross-boundary work and cooperation that has taken place. Currently, this aspect is not clear and therefore, as with previously failed local plans in Oxford, would be open to challenge.

6.1.3 Although we understand the constraints Oxford has with its capacity for housing, ultimately the housing need will not be met within the authoritative area of Oxford or indeed in neighbouring authorities based on the figures provided. There is therefore a serious issue of soundness with the draft plan as currently written due to this unmet need.

6.1.4 Whilst there are confirmed commitments made by three neighbouring authorities, unfortunately the reality of the figures does not match what is required, and there will still be a significant shortfall on housing numbers based on current numbers. Such a shortfall must be found in neighbouring authorities due to the constraints on Oxford.

6.1.5 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.

6.1.6 We hope you have found these representations informative and useful towards the preparation of the Oxford Local Plan.

6.1.7 Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at [redacted]


SCHOOL



