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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: Sarah Hamilton-Foyn

Organisation (if applicable): Pegasus Group on behalf of Dorchester Living

Address: [redacted]

Email:

Date: 11.03.2026

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 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	H1	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 see attached letter dated 11th March 2026

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 attached letter dated 11th March 2026

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

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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	S1	Sustainability Appraisal	SA

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?	☑

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Please use an extra sheet if completing a paper copy.

This is the end of the comment form

SHF/ P20-1799

11th March 2026

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

Sent by email only **planningpolicy@oxford.gov.uk**

Dear Sir,

Oxford Local Plan 2045 Reg 19 consultation

Pegasus Group have been instructed by Dorchester Living to respond to, and make representations on, the Oxford City Local Plan Reg 19 in respect of proposed strategy and Policy H1 Housing requirement.

We consider that the Plan is legally compliant, but we would raise issues of soundness in relation to:

- the spatial strategy,
- housing requirement and
- the Sustainability Appraisal.

In our view the Plan is not positively prepared or consistent with national policy.

We have completed the representation form Part A and attached it to this letter.

There are no paragraph numbers, so our comments relate to the chapter and the policy as set out below.

Chapter 1 Introduction and Spatial Strategy

As it stands, the Councils approach fails to properly acknowledge the relationship and interaction between housing and economic growth. However, before setting out our detailed points on Policy H1 it is worth noting that the key considerations for the spatial policy (Policy S1) as set out in the policy context on page 6 are:

- *"The aim of the plan is to understand and try to meet the city's needs, without having detrimental effects on economic, social and environmental sustainability objectives.*
- *The Plan sets a housing requirement, in Policy H1, that seeks to meet housing needs as far as possible using a capacity-based approach.*

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- The Local Plan's policies rightly focus on delivering sustainable growth for Oxford, compliant with the presumption in favour of sustainable development in the National Planning Policy Framework (NPPF) that meets the objectives, including by delivering affordable housing, supporting an inclusive economy, ensuring the protection of our green and blue networks and natural resources and supporting the city in moving towards being net zero carbon by 2040".

It was recognised in the previous round of Local Plan preparation that Oxford City did not have the capacity to accommodate all of its housing needs. A Memorandum of Understanding was therefore agreed and signed in September 2016 with neighbouring authorities that the apportionment of Oxford's unmet housing need would be met. The agreement detailed the specific number of homes each District would be responsible for accommodating to help meet Oxford's unmet need, the total figure was 15,000 homes. Each of the district councils were responsible for detailing where in their local plans.

The SA which supports the Reg 19 Local Plan does not test higher levels of growth than the SM. This is odd as increasing growth beyond the SM is plainly a 'reasonable alternative'.

The SA paragraph 1.13 stats that:

"The SA report explores options / alternative approaches with a focus on key elements of the Local Plan in order to ensure that the SA focuses only on 'significant effects', which are as follows:
• The Local Plan growth strategy
• Select thematic policy areas
• Site allocations"

The SA explains that six growth strategy alternatives have been identified and appraised (Table 1.5), each involving a different approach to balancing housing and employment, as well as wider development needs alongside other local plan objectives.

Table 1.5: Growth strategy alternatives considered for Oxford Local Plan 2045.

	Balanced development	**Boost brownfield supply**	**Boost greenfield supply**
Prioritise housing	Option 1a (The chosen growth strategy)	Option 2a	Option 3a
Prioritise employment	Option 1b	Option 2b	Option 3b

The SA explains at para 1.15 that growth strategy alternatives have been appraised using the SA framework. The results are set out in Table 1.6. The paragraph concludes that a case could be made for made for options 2b, 3a and 3b from either a housing (option 3a), or an economic growth perspective (options 2b and 3b), this would come at considerable cost in terms of wider objectives.

Policy Options set 001a: Housing requirement for the plan period, however whilst three options are tested, in the Background paper 001 Housing Need, Requirement and Mix, the Option C higher level of housing is dismissed.

- Option A – set a housing requirement based on the full housing need as identified by the SM

- Option B – set a lower housing requirement the need identified through the SM (i.e. capacity based approach)

- Option C – set a housing requirement higher than the SM in order to support economic growth or affordable housing need even through the achieving this requirement would rely on delivery outside Oxford city's boundaries.

The pros and cons of each option are considered in the Background Paper 001. However, Option A irrespective of the advantages it would bring in terms of providing much needed housing to help improve affordability (Oxford is the least affordable housing market for median and lower quartile house prices relative to earnings) so that staff in employment or moving to the area for employment can live locally, reducing social problems, such as overcrowding and homeless; appears to be dismissed simply because a higher level of growth could not physically be accommodated in Oxford City itself or would put pressure on other land uses.

Option B which is based on capacity is the Council's preferred approach, in order to ensure that the acknowledged need is deliverable and meets the test of soundness. The Council's concern is that a requirement that meets or exceeds needs is likely to be unachievable and that pressure would be placed on other policies aiming to meet the Plans' strategy (para 5.42 of the SA).

It is our view that the Council's approach is inconsistent with the NPPF 2024 (paragraphs 24 – 28) – effective strategic planning, especially to promote growth, across local planning authorities boundaries will play a vital and increasing role in how sustainable growth is delivered etc. We expand upon this point under Policy H1.

Option C is to set a housing requirement higher that the SM to support economic growth or affordable housing need, the Council acknowledge that this would be likely to result in delivery outside the city's boundaries. The pros of this option are set out, the paper states that this option does not, take into account

"*the exceptionally strong economic growth in Oxfordshire, that, if not supported by housing, leads to greater problems of affordability, inaccessibility of housing and increased commuting. The affordable housing need in Oxford is also incredibly high and not necessarily fully accounted for by the affordability uplift. Attempting to meet this need helps overcome social problems exacerbated by insufficient housing.*"

It is noted that the Council conclude that this option is not deliverable because of the limited capacity in the City, but it does nevertheless recognise that:

"there would be significant unmet need issues, and we would need to work with other Oxfordshire districts to make provision to accommodate unmet need in their areas. Continued growth at this level would also benefit from continued infrastructure funding from Government, such as through the Growth Deal and HIF".

It is considered that in order to meet the unmet needs it falls to Oxford City to work with its neighbouring authorities to identify additional supply to meet these needs as part of their duty to co-operate, but also importantly with the duty to cooperate about to be "scrapped" the requirements of the NPPF in terms of maintaining effective cooperation are relevant. It is therefore essential that agreements must be reached so that unmet needs will be met in full and to ensure that when new plans are prepared in adjacent local authorities, they will maintain commitments to meeting the housing needs of Oxford and not seek to use preexisting supply to address their own needs, leaving Oxford City with substantial unmet housing needs. This was a particular concern made by parties including Oxford City during the recent 'part 1' examination of the recent Cherwell Local Plan. Without such agreements there can be no likelihood that Oxford's need in their latest plan will be met in full.

The Council's approach is therefore based on the limited capacity of the city to ensure that the policy is deliverable and meets the tests of soundness. The SA concludes that whilst Options A and C, *"do score better than option B for meeting local housing need (objective 4) and achieving sustainable economic growth (objective 12), they also incur significant compromises to other objectives at the same time including the need for green infrastructure, high quality design and climate resilience which is likely to compromise the overall sustainability of the Local Plan."*

In our view as set out below and in response to Policy H1 this approach is inconsistent with national policy and the wider expectations of the role of Oxford City and Oxfordshire in contributing to the objectives of growth.

Whilst Oxford City is constrained in terms of capacity to accommodate future housing needs, the Plan needs to be prepared in the context of overall growth taking into account the Government's new Growth Commission for Oxford which was set up in May 2025 to help accelerate growth in the city and its surrounding area.

The Interim Report of the Growth Commission was published in December 2025 and sets out the "*interim views on how best to unlock and accelerate growth in Oxford and the surrounding area*."

"*It includes 47 recommendations for central and local partners, with a focus on maximising the benefits of growth for the local area and the UK as a whole."* (my emphasis)

Chapter 2 A Healthy and Inclusive City to Live
Housing Requirement – Policy H1

Policy H1 makes provision for at least 9,267 new homes to be built in Oxford over the plan period 2025-2045 (i.e. an average of 463 per annum). The Standard Method of Oxford City is more than double this figure at 1,087 dwellings per annum. Consequently, there is a shortfall of 624dpa against the minimum number of homes, over the plan period this equates to 12,480 dwellings.

As mentioned above the Standard Method only identifies the minimum number of homes to be planned for.

"The standard method set out below identifies a minimum annual housing need figure, and ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. It does not produce a housing requirement figure. Paragraph: 002 Reference ID: 2a-002-20241212"

"Whereas the housing requirement is "*the minimum number of homes that a plan seeks to provide during the plan period."*

"The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.

Paragraph: 040 Reference ID: 2a-040-20241212 "

The NPPF is clear that in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed etc. Furthermore paragraph 85 of the NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adopt and that significant weight should be placed on the need to support economic growth and productivity.

The impact of housing on economic growth is also recognising in paragraph 86d of the NPPF which requires planning policies to address potential barriers to investment such as a lack of housing.

The impact of restricted housing growth to the bare minimum, upon economic growth has long been recognised as a key issue by Oxford City Council. The City has previously engaged and worked with its neighbours to ensure housing delivery and economic growth are aligned. These issues remain unresolved and are identified in the introduction to Chapter 2 (second main paragraph – paragraphs are not numbered) i.e.:

- acute housing pressures,
- urgent need for more housing,
- demand outstrips supply, leading to high property prices and a limited supply of affordable
- housing.

- need to support the economy (the supply of available and affordable housing is a priority in supporting the economy, including healthcare and education needed for the city, because it means that staff can be both attracted and retained more readily),
- many lower paid essential workers cannot afford to live in or even close to the city and employers therefore experience high staff turnover and vacancy rates which can affect their operations.

In addition, Oxford is an international city and an important part of the knowledge economy, with world renowned university and hospitals (as set out in Background Paper 001 Housing Need, requirement and mix). The Background Paper acknowledges that housing need across Oxford is high and that there is a need across all types of housing and sizes (paragraph 2.2). This was further supported by the UK 2024 Autumn budget which outlined the next steps in the government's approach to regional growth, through investment, devolution, and reform.

On investment, this includes unlocking transformational growth in the Oxford, Milton Keynes and Cambridge corridor through £10 million of funding to enable the Cambridge Growth Company to develop an ambitious plan for the housing, transport, water, and wider infrastructure Cambridge needs to realise its full potential, and by taking the next steps to deliver East West Rail.

The Department for Transport's (DfT) settlement provides funding to commit to East West Rail between Oxford, Milton Keynes and Cambridge, including funding to accelerate delivery of the Marston Vale Line ensuring services will run between Oxford and Bedford from 2030. It also was highlighted how the East West Rail will connect Oxford, Milton Keynes and Cambridge and unlock land for housing and laboratories, supporting the wider Cambridge life sciences cluster.

Added to this is the Chancellor's statement of support for the Oxford – Cambridge growth corridor (28th January 2025) and more recently the UK's Modern Industry Strategy (June 2025) which supports eight sectors with the highest potential. As part of the UK Modern Industry Strategy, the Government will enable investment and growth in city regions and clusters across the UK where the IS-8 are based, with a coherent offer across the nations and regions, within this reference is made to strengthening connections between and with city regions and clusters, this includes a more focused support for the Oxford to Cambridge Growth Corridor, and build links between and within other cities, and nations through projects.

The Government have stated in the UK's Modern Industrial Strategy (November 2025) that:

"We will deepen our support for the Oxford Cambridge Growth Corridor and its strengths in Digital and Technologies, Life Sciences, Defence, Advanced Manufacturing, and Clean Energy Industries, anchored by two of the best universities in the world. Accounting 7% of GDP and contributing £40 billion to the economy a year we will unlock its potential by:

*• **Taking forward major housing and infrastructure projects** to make it easier to live, work, and travel across the Corridor. This will include:*

- East-West Rail, a major new cross-country rail line cutting journey times significantly between Oxford and Cambridge. This will enable delivery of up to 100,000 new homes,

create thousands of new jobs by expanding the commuting populations of economic centres across the corridor, and add £6.7 billion a year to regional GVA by 2050. The first phase will launch later this year and enable direct rail travel between Oxford and Milton Keynes…

Ensuring that water companies build new reservoirs in areas around Cambridge (the Fens) and Oxford (Abingdon) so that industrial and residential developments are not held back due to pressures on water availability."

- ***Strengthening the region's science and technology credentials*** *through the UK's first AI Growth Zone in Culham, Oxfordshire, confirmed as the first site for our new flagship programme to facilitate AI infrastructure and unlock investment in AI-enabled data centres.*

- ***Exploring how to strengthen collaboration between the Oxford Cambridge Growth Corridor*** *and other parts of the UK with complementary strengths.*

- ***Addressing the shortage of high-quality research facilities caused by consistently high demand for R&D space…*** *The Oxford Growth Commission will also develop a long term investment strategy."*

The Chanceller in the Budget Statement in November 2025 once again emphasised the delivery of long-term schemes such as Oxford to Cambridge and Northern growth corridors

"At the same time, the government's reforms are unblocking major projects – from reservoirs to wind farms to a third runway at Heathrow – and providing certainty and stability through the 10-Year Infrastructure Strategy, backed by at least £725 billion over the next decade to deliver significant, long-term schemes such as the Oxford to Cambridge and Northern growth corridors ('UK Infrastructure: A 10 Year Strategy', HM Treasury and National Infrastructure and Service Transformation Authority, June 2025).

The November 2025 Budget also stated that the government is "accelerating progress on the Oxford – Cambridge Growth Corridor"

"*In October, the government announced over £500 million of support for the region to unlock growth and accelerate opportunities, alongside a £10 billion private sector investment by the Ellison Institute of Technology at its Oxford site.170 This, alongside East West Rail, new reservoirs and the first AI Growth Zone, will help drive the Corridor to reach its true potential."*

More recently the Interim Report of the Growth Commission was published in December 2025 and sets out the *"interim views on how best to unlock and accelerate growth in Oxford and the surrounding area."*

"*It includes 47 recommendations for central and local partners, with a focus on maximising the benefits of growth for the local area and the UK as a whole."*

The report clearly states that "development that is ready to go should be enabled rather than delayed by the need for new plans". The approach should "*be based on achieving at least the minimum housing requirements set by the Government, with a further allowance for accommodating economic growth." (my emphasis).*

The Oxford City Local Plan therefore needs to be more ambitious and include an allowance for accommodating economic growth.

In summary the approach that the Council is taking through the Local Plan should not reflect the bare minimum but rather should reflect the wider initiatives outlined above and also reflect locally the Oxfordshire Leaders Joint Committee (OLJC) and the Vision for Oxfordshire. The OJLC (formerly the Future Oxfordshire Partnership (FOP) was formed " *as part of a reset to align with emerging national and regional priorities this shift is prompted by the need to be prepared to engage with the UK government's evolving stance on devolution, proposed reforms to economic planning and industrial strategy, and the conclusion of the Oxfordshire Housing and Growth Deal around which much of FOP's activity was focussed*."

The Vision for Oxfordshire includes nine outcomes which are interrelated but in particularly highlighting here: "4 *Our local economy will be globally competitive, sustainable, diverse and inclusive and 7 We will have energy efficient and affordable homes in the right number, location and tenure*." It should also be recognised that the Oxford Growth Commission support the delivery of infrastructure, housing and employment to unleash Oxford and Oxfordshire's economic power.

There is an exceptionally strong case for a higher level of growth than is being provided for in the City Plan, whilst recognising that Oxford City has limited capacity (and this was the case when the adopted City Local Plan was prepared); it is considered that it is incumbent upon the authorities to work together to deliver the significant boost to the supply of homes (following on from the Growth Deal) in accordance with the NPPF and support both the local and national economic objectives some of which are outlined above. As set out in paragraph 69 of the NPPF the requirement may be higher than the identified housing need if for example it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment. Paragraphs 85 and 86 states that significant weight should be placed upon the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development. The NPPF states that: "*this is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential*."

Paragraph 86 of the NPPF states that:
"*Planning policies should:*
a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration."

Modifications
It is considered that provision should therefore be made for a higher housing requirement than that based on the Standard Method (this level of growth should not be dismissed purely on the basis that there is insufficient capacity) and we would therefore seek modifications to the Local Plan which reflect and support the economic growth of Oxford and its hinterland and recognise that the housing needs of Oxford may well be higher than those proposed by the standard method and in doing so explore this strategic issue with neighbouring authorities through the duty to co-operate/maintaining effective co-operation. We would suggest that an uplift of a minimum of 25% over the SM would be the least that would be expected.

I would be grateful if you could confirm safe receipt of this representation.

Yours faithfully

[redacted]

SARAH HAMILTON-FOYN
Executive Director
[redacted]

cc	Neil Cottrell	Dorchester Living
	Gavin Angell	Dorchester Living