



Planning Inspectorate

Examination of the Oxford Local Plan 2045

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Matters, Issues and Questions for Stage 1

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Introduction

Prior to the forthcoming Stage 1 hearing sessions, responses are invited from participants on the following Matters, Issues and Questions ('MIQs') for Examination. The MIQs are based on the Main Issues identified by the Council and other relevant issues raised by representors.

The Stage 1 hearings will focus on matters relating to legal compliance, housing and employment needs and the spatial strategy. The hearings will take place between **20-23 October 2026**. Stage 2 of the examination will follow in due course and will consider sites and development management policies.

For now, only responses to the Stage 1 MIQs are required. The deadline for providing Hearing Statements for Stage 1 is **Thursday 8 October 2026**. Further information about the examination, hearings and format of written statements is provided in the accompanying Examination Guidance Note, which should be read alongside the MIQs.

In answering questions and producing hearing statements, participants should be aware of the Council's background topic papers dated June and July 2026, the latest Memorandum of Understanding relating to Oxford's unmet housing need (Core Document COM.003, dated 2 July 2026) and the Council's suggested changes to Policy H1 (Core Document CSD.009). These documents are available on the examination website <https://www.oxford.gov.uk/oxford-local-plan-2045/oxford-local-plan-2045-examination>

The Local Plan was submitted for examination on 14 July 2026. On 17 August 2026 an updated version of the National Planning Policy Framework ('the Framework') was issued. However, it contains a transitional arrangement meaning that, for the purpose of this examination, the policies in the 2024 Framework continue to apply. Therefore, unless otherwise stated, any references to the Framework in this document refers to 2024 version.

Matter 1 – Legal Compliance

Issue 1 – Legal Challenge

1. Paragraph 14 of the ‘Proposed Submission Draft Oxford Local Plan Report to Council’¹ refers to a legal challenge and subsequent injunction preventing submission of the Local Plan for examination. In response, the Council’s position is that subject to making a fresh determination on whether the Plan should be submitted for examination, having considered representations made at the Regulation 18 and Regulation 19 stages, “...*there would be no basis for the injunction to be maintained.*”

Q1 What is the latest position regarding the legal challenge and associated injunction which prevented submission of the Local Plan for examination?

Q2 How, when and by what means did the Council decide whether or not to submit the Local Plan for examination, and as part of this process, how were opinions expressed through representations taken into account?

Q3 Following submission of the Plan, are there any outstanding matters that would prevent its examination?

Issue 2 – Public Consultation

Q1 Has public consultation been conducted in accordance with the Council’s Statement of Community Involvement, the Framework, the PPG and the requirements of the 2004 Act and 2012 Regulations?

Issue 3 – Sustainability Appraisal (‘SA’)

Q1 Paragraph 5.15 of the SA describes 2 options considered by the Council in developing the Plan: prioritising housing and prioritising employment. The housing option seeks to only protect and intensify ‘key employment sites’. However, by protecting employment sites in this way, has the Council considered reasonable alternatives to a sufficient degree, including those which could deliver a greater number of new homes in Oxford?

Q2 In considering and testing high-level growth options, how have other policy requirements shaped strategic decisions, such as Policy G1 and the protection of ‘Core Spaces’?

¹ Core Document CSD.010

Q3 How were the Areas of Focus considered as part of the plan-making process through the SA, including consideration of an alternative spatial strategy?

Q4 Where sites are concerned, how did the SA test the proposals in the Plan against reasonable alternatives?

Q5 How does the SA consider relevant economic, social and environmental objectives where the precise scale of housing is unknown on some allocations?

Q6 Has the preparation of the Plan met the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004? If not, what actions are necessary at this stage to remedy any issues relating to matters of legal compliance?

Issue 4 – Habitat Regulations Assessment ('HRA')

Q1 Is the HRA justified in screening-out the Cothill Fen Special Area of Conservation ('SAC') and the Little Wittenham SAC based on their distance from the plan area?

Q2 What is the justification for finding that the Plan, either alone or in combination with other plans and projects, is unlikely to have a significant effect on air quality at the Oxford Meadows SAC? How has the Council followed the advice provided by Natural England (referred to in Regulation 19 representations) and how does this lead to the conclusions in the HRA?

2. Where recreational disturbance is concerned, a visitor survey was conducted in May 2025 to inform the Plan. The aim of the survey was to understand how the Oxford Meadows SAC was used by residents, having particular regard to dog walkers.

Q3 Was the survey adequately robust and detailed enough to inform strategic decisions about sites and likely mitigation required? If not, what alternative sources of evidence could have informed plan-making decisions?

Q4 Where mitigation is proposed, such as greater open space requirements for certain sites, how will decision-makers ensure that the policies are effective in providing suitable alternatives to the Oxford Meadows SAC?

Q5 Have the requirements of the Conservation of Habitats and Species Regulations 2017 as amended been satisfied in preparing the Local Plan?

Issue 5 – Climate Change

Q1 Does the Plan (taken as a whole) include policies designed to secure that the development and use of land in the area contributes to the mitigation of, and adaptation to, climate change?

Q2 Where policies relate to climate change mitigation and adaptation, are they sufficiently clear enough to be effective? For example, what is expected of applicants to meet the requirements of Policy G9?²

Issue 6 – Public Sector Equality Duty ('PSED')

Q1 In what ways does the Plan seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic, having particular regard to the issue of meeting accommodation needs for Gypsies and Travellers?

Issue 7 – Other Legal Requirements

Q1 Where the Local Plan contains a policy that is intended to supersede another policy in the adopted development plan, does it state that fact and identify the superseded policy?

² Inspectors' Note: Further sessions will consider the soundness of development management policies

Matter 2 – Housing and Employment Needs

Issue 1 – Local Housing Need

3. To determine the minimum number of homes needed, paragraph 62 of the Framework states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in the Planning Practice Guidance ('PPG'). The PPG advises that the standard method provides local planning authorities with a minimum annual housing need figure which can be applied to the whole plan period.

Q1 Using the standard method, what is the minimum number of new homes needed over the plan period? Is this adequately set out in the Plan?

Issue 2 – The Housing Requirement – Policy H1

4. Policy H1 sets out a total housing requirement over the plan period of 9,267 new homes (or 463 new homes per year). The supporting text states that this figure is derived from the Strategic Housing Land Availability Assessment ('SHLAA'). This is because the need for housing in Oxford is greater than the capacity of the city to deliver it.

Q1 How did the Council identify sites to assess in the SHLAA? Has a sufficient range of sites been considered for housing?

Q2 What is the minimum site size and/or threshold that the Council used? Is there potential for additional housing to come forward on smaller sites?

Q3 In determining capacity, how did the Council take into account other land use designations and planning policies, including the Green Belt, green infrastructure and land designated for employment purposes?

Q4 How has the Council sought to maximise densities and prioritise the efficient use of land?

Q5 Are there any suitable, available and developable sites which the Council has not considered as part of the plan-making process? Could other sites (notably existing employment sites) be reused for housing?

Q6 Based on the available evidence, how many new homes are expected to come forward in Oxford over the plan period?

Q7 What is the housing requirement for the plan period, is this figure justified and is it clearly set out in the Plan?

Issue 3 – Maintaining Effective Cooperation

5. Paragraph 26 of the Framework states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

Q1 As part of the Plan's preparation, how and when did the Council engage with other strategic policy-making authorities on the issue of housing needs and the capacity constraints identified above?

Q2 What is the latest (agreed) position between the Council and neighbouring authorities regarding the scale and distribution of Oxford City's unmet housing needs? To be effective, should this be set out in the Plan?

Q3 How and where will the unmet housing need generated by the Plan be met? How has the Council engaged with neighbouring authorities on this issue?

Issue 4 – Affordable Housing Needs and Provision of Affordable Homes – Policy H2

Q1 What is the need for affordable housing over the plan period and where is this set out?

Q2 Based on the housing requirement in the Plan, and the thresholds set out in Policy H2, how many affordable homes are expected to be provided over the plan period?

Q3 How have affordable housing needs been considered through effective engagement with neighbouring authorities?

Q4 Policy H2 requires a “minimum” of 40% affordable housing on qualifying sites (and a minimum of 50% on sites in, or released from, the Green Belt). Is the Plan sufficiently clear how much affordable housing is required from development proposals? Is it effective?

Q5 What is the justification for the 40-50% split in Policy H2? Is this justified and does it adequately reflect the typologies tested in the Local Plan Viability Assessment³?

³ Core Document SUP.002

Issue 5 – Older People and Student Accommodation Needs

6. Paragraph 63 of the Framework states that the need, size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including (but not limited to) older people and students.

Q1 What is the need for specialist housing for older people over the plan period? Is this set out in the Plan?

Q2 How does the Plan ensure that the needs for older persons accommodation will be met over the plan period?

Q3 What is the need for student accommodation over the plan period? Is this set out in the Plan?

Q4 How does the Plan ensure that the needs for student accommodation will be met over the plan period?

Issue 6– Employment Land Needs – Policy E1

Q1 How have the employment floorspace needs in the supporting text to Policy E1 been established? Are they robust and based on appropriate available evidence?

Q2 The Oxford City Employment Land Needs Assessment⁴ (paragraphs 8.21-8.23) states that the considerable need for research and development space can be met from commitments and ‘potential supply that has been promoted to the Council’. What are the sources of ‘potential supply’ and how does the Plan ensure that they will contribute towards identified needs?

Q3 Will the Plan ensure that employment needs are met over the plan period? Is the economic strategy and the location of proposed sites sufficiently clear enough to be effective?

Q4 How will the needs for storage and distribution uses be met over the plan period?

⁴ Core Document ECON.001

Matter 3 – Spatial Strategy and Approach to Development

Issue 1 – Spatial Strategy – Policy S1

- Q1 What is the spatial strategy and is it sufficiently clear to users of the Plan?
- Q2 What are the ‘Areas of Focus’ and how do they relate to Policy S1 and the strategy?
- Q3 Is it sufficiently clear to users of the Plan what types of development will be permitted and where? Is the spatial strategy effective?
- Q4 How does the spatial strategy reflect strategic decisions around the provision of new infrastructure, ensuring that new development is supported by the necessary infrastructure and facilities?
- Q5 Does the spatial strategy reflect growth proposed in adjoining local planning authorities and how has a collaborative approach been taken to developments coming forward around Oxford?

Issue 2 – Core Green Infrastructure Network – Policy G1

- Q1 Is the identification of Core Green Infrastructure justified and consistent with national planning policy?
- Q2 How did the approach to Core Green Infrastructure (as set out in Policy G1) inform strategic decisions for growth? Is this justified, positively prepared and consistent with national planning policy?
- Q3 Is the approach to restricting all forms of development affecting Core Green Infrastructure justified?
- Q4 Is Policy G1 justified, effective and consistent with national planning policy, especially where the reuse and redevelopment of open space is proposed?

Issue 3 – Green Belt Review

7. National planning policy states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of Plans.

8. Paragraph 146 of the Framework states that exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with policies in the Framework and propose alterations to meet needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.

Q1 Having established the minimum housing need over the plan period, and the likely capacity of sites to meet that need, how did the Council approach reviewing Green Belt boundaries?

Q2 Was the process of assessing land parcels sufficiently clear and robust, and did it follow the guidance set out in the PPG?

Q3 How did the Council then consider the findings from the Green Belt Review in shaping the strategy and deciding which sites to allocate?

Q4 Were areas identified as potentially suitable for release from the Green Belt, but not actively promoted for development? If so, how did the Council approach this situation in developing the Plan and seeking to meet housing needs?

Q5 Where alterations are proposed to the Green Belt boundary, can the Council demonstrate exceptional circumstances in accordance with paragraph 147 of the Framework?

Inspectors' Note – In answering the question above, it would assist the examination if the Council could produce a list showing all the proposed changes to the Green Belt boundary as a result of the submission Local Plan.

Issue 4 – Employment Strategy – Policies E1 and E2

Q1 What is the justification for restricting employment generating uses outside Key Employment Sites, city and district centres and existing lawful employment sites? Is this consistent with paragraph 85 of the Framework, which requires planning policies to help create the conditions in which businesses can invest, and paragraph 86 e), which requires policies to be flexible enough to accommodate needs not anticipated in the Plan?

Q2 What is the justification for requiring employment proposals outside Key Employment Sites and city and district centres to “follow the sequential approach for new town centre uses”?

Q3 Background Paper 004a (Key Employment Sites Methodology) describes how a quantitative assessment was used, along with professional judgement, to determine if sites should be designated as Key Employment Sites. As part of this process, how and why was a score of 36 points used?

Q4 Are the Key Employment Sites justified and was the process of designation based on appropriate available evidence?

Q5 Where sites did not meet the criteria for designation, how were they taken forward in the Plan? Were they considered for alternative uses?

Q6 Where the redevelopment of Key Employment Sites is concerned, what is the justification for maintaining employment uses and the retaining the number of jobs in employment? How would job numbers be established and is the policy justified and effective?

Q7 How does Policy E2 reflect the identified need for warehousing, storage and distribution in Oxford?

Q8 How much additional floorspace for warehousing, storage and distribution is proposed? How does this relate to need?

Issue 5 – Strategy for Student Accommodation – Policies H8, H9 and H14

Q1 What is the need for student accommodation over the Plan period? Is this set out in the Plan?

Q2 How does the Plan make provision to meet the identified needs for student accommodation?

Q3 Would the proposed locational focus of new student accommodation as set out in Policy H8 ensure that there would be sufficiently mixed and balanced communities across the Plan area? How would this approach create and/or maintain mixed and balanced communities and is it justified?

Q4 How would the approach set out in Policy H9 adequately ensure that the provision of student accommodation would be conditionally linked to the provision of new academic facilities? How would this be delivered and monitored?

Q5 Does the approach for the provision of boarding school accommodation as set out in Policy H14 reflect the overall strategy for student housing set out in the Plan? Does it also reflect the overall spatial strategy as set out in Policy S1?