

HEARING STATEMENT – MATTER 2 - HOUSING AND EMPLOYMENT NEEDS

Examination of the Oxford Local Plan 2045

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*Please also see earlier Reg 19 response- Response ID ANON-M2Q4-48J8-J
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Issue 1 – Local Housing Need

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?

It is not at clear from the submitted documents or the post- submission HOUSING NEED AND REQUIREMENT – update how the housing need or requirement figures were reached. There is no information on how these calculations were made or background evidence. It is not adequately set out in the Plan,

Oxford City Council stated at the last hearing of this Plan that they would plan to continue to have 30% of all Oxfordshire’s jobs in Oxford City. Given that the area of Oxford City is 17.6 sq miles and that of Oxfordshire is 1,006 sq miles this is plainly unsustainable.

The calculation of housing need is based upon this unrealistic aspiration of attracting a significant number of new businesses and thus jobs to the City of Oxford. Businesses have actually been moving out of the City as commuting into the city is very lengthy and has recently become more lengthy and very expensive.

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?

Oxford City’s policies have prioritised employment land for development and restricted mixed use of land for housing and restricted employment land. This results in an inflation in ‘unmet housing need” which is exported to neighbouring districts. Thus, land for housing has been restricted and made more expensive increasing the cost of housing. As an example the Oxford Business Park – the old Rover works at Cowley was first developed as a business park in 1990s. There are still a number of vacant sites after nearly 40 years of development, but Oxford City will not allow this land to be used for

housing. Recently a number of office blocks on the site have been demolished and rebuilt. There are a number of vacant buildings. There are many other sites where mixed housing and employment could be integrated on the same site, but housing has been excluded e.g. the Botley Road and Osney Mead.

This ultimately restricts the number of businesses wanting to locate into Oxford as any employees would not be able to live locally and would need lengthy and costly commutes.

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?

No, it appears they did not. In Oxford there were 1,847 empty houses in Oct '25¹. New legislation has just been passed to enable a local authority to intervene after 6 months instead of 2 years to make use of empty properties. There appears to be no plan to do this.

There has been a very useful study just published by CPRE on developing brownfield land in Oxfordshire - Brownfield land could provide more than 8,000 potential homes across Oxfordshire². This report has identified potential capacity for 2,498 homes in Oxford on brownfield sites.

It has become apparent through the Local Government Reorganisation for Oxfordshire and Oxford City's proposal for 3-Council unitary authorities for Oxfordshire that Oxford City views the Green Belt surrounding Oxford as development land to build up to 61,000 houses on over 2,000 acres of Green Belt countryside. It is clear that empire building is the most important aim with little regard for the countryside, habitats, wildlife or biodiversity or the rural communities currently living there.

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?

Yes, as stated above many/most of the designated employment sites could be used for as mixed sites for housing and employment, On the other hand there has been considerable criticism about siting new development of laboratories in Headington High Street to replace shops and similar criticism for student accommodation in the middle of city's shopping centre.

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https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F6a2bf816e50716856ed4afdd%2FLive_Table_615.ods&wdOrigin=BROWSELINK

² <https://www.cprexon.org.uk/news/brownfield-land-could-provide-more-than-8000-potential-homes-across-oxfordshire/>

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

The housing requirement is not clearly set out in the Plan and particularly how figures were assessed and calculated. The earlier version of this Plan used Oxford's own undisclosed method for calculation and inflating housing need and the calculations were not published. The Council says it has used the Government standard method this time and figures have been reduced slightly, but there is no evidence base for these calculations and the calculations themselves do not appear to be available. This should be transparent.

As stated earlier the housing numbers are calculated on the basis of realistic, inflated growth in jobs.

Issue 3 – Maintaining Effective Cooperation

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?

The details of how Oxford's alleged 'unmet housing need' will be exported to surrounding districts is not transparent and the basis on which this has been shared out is unfair and unacceptable. It was apportioned on the basis of the length of the boundary between the district councils surrounding Oxford. In the case of SODC this is grossly unfair and disproportionate. It does not take account the land available and in the case of SODC there is very little land to the north and east of Oxford as the borders of Bucks are very nearby.

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?

It is apparent that Oxford City has only 'engaged' with surrounding districts in Oxfordshire. The only sustainable way of commuting into Oxford is by rail. Yet Oxford appears not to have included the large new developments of houses on direct rail routes into Oxford. These include but are not confined to – Milton Keynes, Aylesbury and the Oxford Cambridge new railway link with substantial housing along the route. Together these make up a very considerable number of new houses whose occupants can commute easily into Oxford to fill some of the jobs Oxford City is hoping to attract. This will reduce the alleged 'unmet housing need' being exported to surrounding districts.

The method used for previous plans assumed that commuting into Oxford would only come in significant numbers from elsewhere in Oxfordshire. While East West Rail was a concept that might or might not be funded this could be defended though it was not consistent with published Government policy.

The Chiltern line from Oxford to London has been open for ten years. The Government has now announced that trains to Winslow and Milton Keynes will be included in the December 2026 timetable. Work is under way to extend the line to Bedford expected to

open in 2030. The line between Bedford and Cambridge is not yet defined but this is outside regular commuting.

The **Milton Keynes City Plan 2050** has been submitted to inspection with **60,000 houses** and there are numerous Government announcements of the housing that will be provided along the Oxford Cambridge Arc, eg.

<https://www.gov.uk/government/news/jobs-homes-and-better-transport-links-for-the-oxford-cambridge-growth-corridor> .

It makes no sense to conclude that no-one will use East-West Rail or to maintain that as many will commute from Oxford to Milton Keynes as the other way. The average house price in Milton Keynes in March 2026 was £324,000 against £474,000 in Oxford (ONS).

Buckinghamshire is directed to submit a plan in December 2026 which will include **95,000 houses**. **Many of these will be built around Winslow, Haddenham and Princes Risborough all in the 30 to 45 minute train journey times, which is probably quicker than by road from around Oxford.**

If the county border were drawn differently all these houses would be included in the calculation to meet Oxford's need. They are no further away than Banbury or Henley. The plan should include an assumption that some of Oxford's unmet need will be met from these plans.

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?

As stated earlier the aim of having 30% of the jobs in Oxfordshire in Oxford is unreasonable and unsustainable. It is unsound. Many businesses are moving out of Oxford as the commuting is too lengthy and costly and this has become considerably worse recently. A high proportion of Oxford employers are in the public sector – NHS and university and it is unlikely these will grow significantly during the Plan period. Private sector and multi-national business are unlikely to be attracted to locate in Oxford due to the cost, commuting and availability of workers. Any expansion is only likely from the natural expansion of small and medium sized enterprises already based in Oxford.

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?

Having personal experience of working in a research laboratory is it not acceptable or realistic to have them based in High Streets (Headington and elsewhere) or near

residential areas. Laboratories need specialist waste removal etc and need to protect the public from chemicals etc.

Issue 3 – Green Belt Review

As discussed under Issue 2 question 3 the Green Belt is greatly threatened by Oxford City's expansion plans and approximately 2,00 acres of Green Belt countryside in SODC alone is to be lost to help to meet Oxford's 'Unmet housing Need'. CPRE has produced a report to show how much brownfield land is available for housing in Oxford and Oxfordshire.

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?