South Oxfordshire District Council
Listening Learning Leading

Policy and Programmes
DIRECTOR: **Tim Oruye**

CONTACT OFFICER: [redacted]
Tel: [redacted]
Textphone: [redacted]
Abbey House, Abbey Close, Abingdon,
OXON, OX14 3JE

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Dear Buckinghamshire Planning Policy Team

Buckinghamshire Local Plan 2045 Regulation 19 Consultation: South Oxfordshire District Council Response

Introduction

Thank you for the opportunity to comment on the Buckinghamshire Local Plan 2045 Regulation 19 consultation.

We have engaged with you throughout the preparation of the Local Plan and previously submitted representations in response to your Regulation 18 consultation in October 2025. We welcome the progress made since that stage, including the publication of a clear spatial strategy and supporting evidence base.

This representation focuses on potential strategic matters of relevance to South Oxfordshire, particularly where there may be cross-boundary implications.
We support the overall direction of the Plan and, whilst our representation is broadly supportive, it identifies a small number of matters where further clarification or amendment may be beneficial in order to ensure the Plan is justified, effective and consistent with national policy.

Overall Strategy and Housing Delivery (Policy SP2)

Policy SP2 and the associated housing strategy is sound.
We welcome your commitment to meeting Buckinghamshire's identified housing need within the plan area. Policy SP2 makes provision for 91,265 homes over the plan period, meeting the identified housing need of 91,230 homes and providing significantly greater

certainty than was available at the Regulation 18 stage regarding the scale and distribution of growth.

We support the principle of delivering growth through a clearly defined spatial strategy that commits to meeting Buckinghamshire's housing needs within the authority area. Housing provision is closely aligned with the identified housing requirement and therefore provides relatively limited flexibility above the minimum requirement. We note that the strategy relies heavily upon ten New and Expanded Settlement (NESS) allocations, which are expected to deliver a significant proportion of planned housing growth.

Continued monitoring of housing trajectories, infrastructure provision and site delivery will therefore be important to ensure delivery remains on track throughout the plan period.

Policy SP4: Employment Land and Economic Growth

Policy SP4 and the associated employment strategy is sound.
The labour-supply-led approach provides a logical framework for aligning employment growth with planned housing delivery and supporting Buckinghamshire's long-term economic ambitions. We support the positive approach taken towards employment growth and recognise the important role Buckinghamshire's economy plays within the wider Oxford to Cambridge region.

We also recognise the economic relationships between Buckinghamshire and South Oxfordshire, including commuting patterns, labour markets and transport connections. As a result, the successful delivery of both housing and employment growth will be important in shaping future travel patterns and economic interactions between our areas.

A significant proportion of employment growth is focused at strategic locations, including Westcott Venture Park, and is closely linked to planned housing delivery. The effectiveness of this approach will therefore depend upon the successful delivery of both housing and employment development over the plan period. We encourage continued monitoring of delivery outcomes and the cumulative impacts of strategic and windfall employment development on commuting patterns and shared transport networks.

Strategic Infrastructure and Transport

The Plan's overall approach to infrastructure planning and transport provision is sound. We welcome the Plan's emphasis on coordinating growth with the delivery of supporting infrastructure. The Plan and supporting evidence acknowledge a number of infrastructure delivery challenges associated with accommodating planned growth,

including transport improvements, wastewater infrastructure upgrades and wider investment requirements.

We also recognise the scale of infrastructure investment required to support growth and the challenges associated with securing funding throughout the plan period. Delivery will be dependent on a combination of developer contributions, infrastructure providers and external funding sources. Whilst we do not have any soundness concerns in this regard, we welcome the continued focus on infrastructure planning and monitoring to ensure that critical infrastructure is delivered alongside growth and that any emerging funding or delivery risks can be identified and addressed at an early stage.

As a neighbouring authority, we are particularly interested in infrastructure networks that operate across administrative boundaries, and we encourage continued engagement with infrastructure providers and neighbouring authorities where upgrades may have wider cross-boundary implications.

Strategic Site Allocations

NESS003: Aylesbury North and NESS005: Haddenham

We consider the approach to the Aylesbury North (NESS003) and Haddenham (NESS005) strategic allocations to be unsound.

We support the requirement for a strategic green gap associated with the River Thame floodplain at Aylesbury North, which will help protect landscape character, biodiversity and flood risk functions.

We also support the allocation at Haddenham and welcome the emphasis placed on sustainable transport, including the opportunity for improved access to Haddenham and Thame Parkway Station and enhanced public transport provision.

However, whilst the policy and supporting text refer to improved access to Haddenham and Thame Parkway Station, neither explicitly recognises nor supports the proposed active travel connection between Haddenham and Thame. Given the close functional relationship between the two settlements and the strategic importance of this route within both Buckinghamshire and Oxfordshire active travel networks, this omission represents a significant weakness in the policy framework for the allocation. The Haddenham-Thame active travel connection is a key cross-boundary opportunity that would support sustainable travel patterns, improve access to Haddenham and Thame Parkway Station, reduce reliance on private car use and enhance connectivity between neighbouring communities. Without explicit recognition of this infrastructure, it is unclear how the Plan will secure or support delivery of this important strategic link.

We therefore consider that the policy is not currently effective for the purposes of paragraph 35 of the NPPF, as it does not provide a sufficiently clear framework for the delivery of a strategically important piece of cross-boundary sustainable transport infrastructure. To address this soundness concern, the policy and supporting text should be amended to explicitly reference and support delivery of the Haddenham-Thame active travel connection as part of the wider sustainable transport strategy for the Aylesbury North (NESS003) and Haddenham (NESS005) allocations.

Environment and Cross-Boundary Matters

The Plan's approach to environmental protection and the management of cross-boundary environmental issues is sound.
We recognise the cross-boundary significance of Aston Rowant Special Area of Conservation (SAC). We would welcome clarification regarding the approach to mitigation for Aston Rowant SAC and whether existing mitigation arrangements are intended to continue through the plan period. Given the cross-boundary nature of the designation and its proximity to South Oxfordshire, continued engagement on this matter would be welcomed.

Policy SP3: Gypsy and Traveller Provision

Policy SP3 and the overall approach to Gypsy and Traveller provision is sound.
We recognise the challenges associated with meeting identified needs and support the proactive approach taken to allocations, future provision and monitoring.
Whilst not all identified needs are met through allocations at the outset, the monitoring and review mechanisms will be important in ensuring future requirements can be addressed in a timely manner.

Conclusion

We welcome the considerable progress made since Regulation 18 and support the overall strategy set out within the Plan. We look forward to continuing to engage with you on the Plan and on matters of shared strategic interest, including infrastructure delivery, transport connectivity and environmental management.