



# Oxford Local Plan 2040 Submission Draft COMMENT FORM

## Part A

You only need to fill Part A in once

Your name:

Organisation (if applicable):

Address:

Email:

Date:

### 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 2040 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2040 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.

### Do you wish to speak at the examination hearings?

(Please note that the Inspector will decide who to invite to speak)

Yes  No

### Do you wish to be notified when:

- the Council submit the Oxford Local Plan 2040 to the Government?
- the Inspector's Report is published?
- the Oxford Local Plan 2040 is adopted by the Council?

# DETAILS OF YOUR COMMENT

## Part B

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.

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

**Q1.** Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph	2.3,2.6 & 2.7 in particular 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
- (c) complies with the duty to co-operate?  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, not legally compliant or fails to comply with the duty to co-operate. If you do believe the document is sound, legally compliant, or complies with the duty to co-operate you may use the box to explain why.

1. The housing requirement is not clearly stated. Instead of using the Standard Method (SHMA 2014). It obliquely references a housing need of 1,322 dpa using untested HENA methodology which results in hugely inflationary growth and a significantly higher target figure. If the public are left to do the maths, this would suggest 26,440 dwellings over the period 2020-2040.  
 2. And once again Oxford City Council continues to allocate land to employment, exacerbating the imbalance between jobs and available housing. This is not sound or sustainable.  
 3. Housing need using HENA is not positively prepared, justified or consistent with National Policy.  
 4. The Plan fails in the Duty to Cooperate (DtC) because Oxford City Council has ignored the concerns of my District Council, South Oxfordshire DC, and its partner, Vale of White Horse DC, who have both made clear their opposition to the HENA methodology and its weaknesses. Oxford City Council have failed to engage in constructive communication with the district councils

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despite expecting them to accommodate high numbers of so-called 'unmet need' housing in the districts.

**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. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) It would be helpful if you could suggest revised wording for the policy or text in question.**

The HENA methodology needs to be jettisoned. The housing requirement figures need to be derived from the Standard Method and be clearly stated for the general public's clear understanding. The Plan needs to be revised accordingly and presented for a second Regulation 19 consultation prior to be submitted to the Inspector for Examination in Public.

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**This is the end of the comment form**