Oxford Local Plan 2040
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Katie Barrett

Organisation (if applicable): POETS - Planning Oxfordshire's Environment and Transport Sustainably

Address: [redacted]

Oxford

[redacted]

Email: [redacted]

Date: 3 January 2024

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.

	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 2040 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2040 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/localplan2040**

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 2040
- 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 5th January 2024.**
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	2.8	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 <u>not</u>: (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.

POETS (Planning Oxfordshire's Environment and Transport Sustainably) are local professionals and academics with long experience in planning, environment and transport – see our website https://www.poetsplanningoxon.uk/. Please read this objection together with our submission on policy E1 and paragraph 3.6 and our comments at the regulation 18 consultation. We wish to appear at the examination including in relation to particular sites in chapter 8 of the submission plan.

Oxfordshire functions as a city region, and it is highly regrettable that joint work on the Oxfordshire Plan to 2050, which would have given a strategic approach to planning in the county, has ceased. This was due to the fundamental disagreement between the districts over the unrealistically high housing need assessments in the Oxfordshire Growth Needs Assessment

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. (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.

Given the failure to cooperate the city council should withdraw the plan and redraft it for proper regulation 18 consultation. If the city council proceeds to an examination, we would recommend the Inspector to reject it on grounds of non-compliance with the duty to cooperate. If the Inspector were not so minded, we would recommend it should be modified as follows

a) Replace the figure of 1322 in paragraph 2.8 with 762 which is the annual housing need assessed using the standard methodology - not the misleadingly inflated standard methodology figure in some of the HENA tables
b) Increase the housing capacity figure in H1 though a positive re-evaluation of sites
c) Change policy E1 to have a more positive approach to housing development.

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This is the end of the comment form