

# South Oxfordshire Local Plan 2034

## Page 3: Part A - contact details

Q1. Are you responding as an:

Individual

## Page 4: Individual contact details

Q2. Due to the plan-making process including an independent examination, a name and means of contact is required for your comments to be considered:

Title	Professor
Full name	Simon Chandler-Wilde
Business / Organisation name (if relevant)	-
Job title (if relevant)	-
Address line 1	██████████
Address line 2	-
Address line 3	-
Postal town	██████████
Postcode	██████
Telephone number	-
Email address	████████████████████

## Page 7: Part B - your comments

Q5. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph: STRAT 1

Q6. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Q7. Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Local Plan provides for far more housing than historical and demographic trends show is needed. The numbers calculated by using the "Standard Method" are 556 homes per annum. Even this figure is greater than the current observed household formation rate between 2001 and 2011 of 200 households per annum. (source Census 2011). The Plan acknowledges that the numbers of homes being proposed is far above need, calling for almost 30,000 houses to be built compared to the official government forecast of 10,000. These numbers can only be justified by the demands of the Oxfordshire Housing and Growth Deal and the Plan itself states that South Oxfordshire is delivering "higher than our local housing needs" (para 4.18).

The justification for the numbers proposed is based on out of date methodologies as the Plan admits - the Oxfordshire SHMA was published in 2014 and is close to the end of its 5-year lifespan, and was based on a methodology for working out housing needs that was set out in the first NPPF in March 2012 and which has now been superseded by the new NPPF (2018). (Para 4.20). The Oxfordshire SHMA was also based on interim household projections and the base data on which it is calculated is now dated.

The Local Plan states that despite the above limitations of methodology and base data "the SHMA is the only document that provides an evidenced approach to the 100,000 homes identified in the Oxfordshire Growth Deal".

This extreme and unnecessary level of development, way above need, is in order to receive funding of £215m from the Oxfordshire Housing and Growth Deal. For 100,000 homes this is just £2,150 per house and will not begin to cover the infrastructure costs required to service such a large increase in homes and population.

Q8. Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

Modifications - The actual housing need for South Oxfordshire is already effectively met within the numbers in the already adopted 2026 Local Plan, so there is no urgent requirement for a new Plan now at all, or any apparent benefit from producing one.

Q10. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q11. Would you like to comment on another policy or paragraph?

Yes

## Page 9: Part B - your comments

Q12. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph: STRAT 2

Q13. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Q14. Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The level of unmet need for the City of Oxford is one of the drivers of the excess housing numbers in the Plan as above. These figures are out of date. In 2018 GL Hearn, authors of the original SHMA, conducted an update of the Objectively Assessed Need calculations for Oxford City and concluded that the latest household projections superseded the 2014 projections and result in a substantially reduced number of homes being required. The new Government official need calculation based on work by John Howell, MP, finds that Oxford only needs 15,000 houses, half the number of the out of date SHMA forecast. Oxford's need, and hence it's unmet need, has been hugely overestimated.

If Oxford City built at densities appropriate for a city and prioritised land for housing, it could accommodate as many as 26,000 homes which would be its full need as identified by the Oxfordshire SHMA 2014.

Q15. Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

The allocation for Oxford's 'unmet need' should be removed from the plan.

Q17. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q18. Would you like to comment on another policy or paragraph?

Yes

## Page 11: Part B - your comments

Q19. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies [here](#). If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph: STRAT 6

Q20. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Q21. Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Plan proposes building on seven Green Belt sites, with nearly 30% of the overall housing numbers to be placed on Green Belt.

National planning policy requires Councils to release Green Belt for needed housing only after all other options have been explored and if no other land is available on which need could be met.

The housing need is grossly inflated hence there is no need to justify these incursions into the Green Belt.

The Kirkham 2015 Green Belt Assessment report concluded that all major parcels of the South Oxfordshire Green Belt fulfilled one or more of the five functions of the Green Belt.

Q22. Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

There are no exceptional circumstances to justify any of these incursions into the Green Belt and sound planning reasons for them to be struck out of the plan.

Q24. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q25. Would you like to comment on another policy or paragraph?

Yes

## Page 13: Part B - your comments

Q26. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies [here](#). If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph: TRANS 1

Q27. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?			X	

Q28. Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

Within the next few years a decision is likely to be made on the proposed Oxford-Cambridge expressway. This huge project has been proposed by the national infrastructure commission with little input from the communities it will heavily impact.

This enormous project is barely mentioned in the plan yet will impose a massive further housing target and potentially devastate the Green Belt south of Oxford and the open countryside and villages within it.

Q29. Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

To be sound, the Plan needs to reveal as much as is known about the magnitude and routing of this new un-voted for growth plan, it's potential impact on the area and the Plan itself, and the Council's intended approach.

Q31. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q32. Would you like to comment on another policy or paragraph?

No

## Page 106: Future contact preferences

Q354. As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es) below:

I would like to be added to the database to receive planning policy updates for South Oxfordshire

I would like to be added to the database to receive planning policy updates for Vale of White Horse