

South Oxfordshire Local Plan 2034

Publication Version

Representation Form

Please return by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@southoxon.gov.uk

This form has two parts:

Part A – contact details

Part B – your comments / participation at oral examination

Part A

Are you responding as an: (please tick)

Agent

Business or organisation

Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

	1. Personal Details	2. Agent Details (if applicable)
Title	<input type="text" value="Professor"/>	<input type="text"/>
Full Name	<input type="text" value="Richard John Harding"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Address Line 2	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Postcode	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Telephone Number	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Email Address	<input type="text" value="[REDACTED]"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

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:

STRAT2

Do you consider the Local Plan and supporting documents:

(1) are legally compliant Yes No Don't know

(2) are sound Yes No Don't know

(3) comply with the Duty to Cooperate Yes No Don't know

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.

This policy is unsound:

- The Policy sets undeliverable targets.** The numbers of completions envisage per year is far in excess of anything that has been delivered in in the last 50 years. It is far beyond the capabilities of the construction industry to deliver and far in excess of the market demand. This is particularly so because all the surrounding Districts have similar ambitious targets and will be competing for workers and customers. There is no sound evidence presented that the targets are justified (see point 3 below).
- The policy is against national policy.** The numbers envisaged far exceed the Objectively Assessed Need recommended in the revised 2018 version of the NPPF. The revised NPPF should be used as this draft will be submitted after January 2019.
- The evidence on housing need is out of date.** The housing need underlying this plan is based on the 2014 SHMA. The projections in this document are based on interim housing projections from 2011. Housing growth projections have consistently fallen over the last 8 years – indeed the most recent household estimates figures for Oxfordshire from the ONS (2016) show a growth of 340 households per year 2011-2016 of 330 new households per year and a projections 2017-2034 of 350 per year. Therefore this policy is unsound because it does no refer to household growth in the recent past or base future plans on most recent and authoritative population and household growth projections.
- Oxford's unmet housing need is unsound. Oxford's housing need should be based on the most recent NPPF and the associated OAN figure. If this was used there would be little or no 'unmet' housing need.

(Continue on page 4 if necessary)

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

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.

Policy STRAT2 should be modified to present a target which is achievable and realistic. This should be using the Government's own Objectively Assessed Need figures presented in the 2018 revision of the NPPF.

(Continue on page 4 if necessary)

Yes No Inspector will determine the most appropriate procedure to be followed if you have indicated that they wish to participate at the public hearing.

Signature:

(this can be electronic)

Date:

Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the planning inspector and programme officer will be kept securely and not used for any other purpose. The inspector and programme officer will retain the data up to six months after the plan has been adopted. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit www.southoxon.gov.uk/dataprotection

Future contact preferences

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):

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

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Alternative formats of this form are available on request. Please email planning.policy@southoxon.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

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