

Summarised 23/1

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**Oxford Local Plan
Proposed Submission Draft, November 2018
Comment Form**

Part A

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Date: 27/12/18

Data Protection. All responses have to be made public.

- I would prefer all personal details other than my name and a non specific address (e.g. Oxford) to be obscured

I do not wish to speak at the examination hearings

I wish to be notified when

- The Council submits the plan to the Government
- The Inspectors Report is published
- The Plan is adopted by the Council

Part B form 1 of 2, from Kay Bicknell

156.1

651 ✓

1. This representation relates to Paragraphs 3.1 to 3.12 and Policy H1

2. I consider the Proposed Submission Plan to be Unsound

3. I consider the Document Unsound because it is Not Justified and Not Effective

4 Reasons why the plan is uncompliant and/or unsound

The plan's housing target is based on out of date evidence. It ignores the Council's own

2018 updated assessment of need and the Government's own standard methodology for calculating need. Both of these put the need at around 750 dwellings per annum rather than the 1400 in the Council's target. Both include a substantial and realistic addition for affordable housing.

In addition, Oxford underestimates its capacity for new housing. Firstly, it is protecting sites for employment that could be used for housing. (such as the Northern Gateway). Secondly, it assumes much lower housing densities than are possible in an urban area when planning predominantly for small dwellings.

Oxford's submitted plan means that surrounding Districts are expected to build large numbers of houses to meet Oxford's assumed needs, destroying Green Belt in the process. This is not necessary, because these needs have been vastly exaggerated and because Oxford's capacity has been underestimated as outlined above.

5 What changes are needed

The plan should use the latest assessments of housing need, which are little more than half of those shown in the plan.

The plan is too protective of land for employment. It should give more priority to housing and to increasing housing density on housing sites.

Part B form 2 of 2, from Kay Bicknell

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652

1. This representation relates to paragraphs 2.1 to 2.10 and Policy E1

2. I consider the Proposed Submission Plan is Unsound

3. I consider the Document Unsound, because it is:

Not Justified and Not Effective

4 Reasons why the plan is uncompliant and/or unsound

The City Council is planning to increase employment substantially in the City but this will be damaging because:

- Oxford has low unemployment already and does not need more jobs
- it will mean even more traffic congestion on the road network
- it will mean more pressure and congestion in the city centre
- it will attract people to the area resulting in more demand for housing and pressure for development on the Green Belt

It does not therefore need to protect sites for employment as proposed in Policy E1 because

- many of these sites could be better used for other purposes and especially housing
- many employment sites in and around the City are already undeveloped or unoccupied (Oxford Business Park and Oxford Science Park are examples – suggest quote others, if known).
- the Council appears to ignore the many, large science parks and other sites that are being planned near Oxford such as at Kidlington, Eynsham and Bicester
- there is no need for “knowledge-based” businesses to be located in proximity to Oxford, especially because of the availability of high speed internet

5 What changes are needed

Policy E1 should be less rigid, and should permit housing on suitable employment sites, especially where these are currently underused.

The city council should actively encourage the re-location of businesses, including some academic, research and medical activities, to suitable locations elsewhere in the county, where it is not essential for them to be based in Oxford.