

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

Part A

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Date: 25/12/2018

Data Protection. All responses have to be made public.

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

OPTIONAL

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 4 from

Alexandra Gallaher

1. To which part of the document does this representation relate?

Paras 2.1 to 2.10
Policy E1

151.1
618

2. Do you consider the Proposed Submission Plan to be

UNSOUND

3. If you consider the Document Unsound, is this because it is: (choose one or more)

Not Justified

Not Effective

Not consistent with National Policy

4. Reasons why the plan is uncompliant and/or unsound

The plan's housing target is incorrect as it is based on evidence which is out of date which means that the Council's target is almost double that which is needed. It is unnecessary to prioritise the need for workers to be physically located near their place of employment in today's high tech environment which makes decentralisation successful for many businesses.

Rather than reserving sites for employment based on employment forecasts which are not realistic, the Council should release many employment areas in and around the City which have not been developed and are unoccupied and use these for new housing. Oxford's assumed needs have been greatly exaggerated and their ability to cope with the real level of need has been significantly underestimated.

Focus should be on reducing the high level of workers travelling into the City. Creating conditions which expect surrounding councils to accept responsibility for the Council's 'unmet housing need' and thereby increasing the volume of inbound commuters, and destroying Green Belt in the process, is contrary to national planning policy.

5. What changes are needed

Oxford City Council should be working with other Councils to move employment growth out of the city, reserving land for only a few employers who really need to be sited within the City. The Northern Gateway development for example should be considered as suitable for housing.

The plan needs to be less focused on protecting land for employment and give more priority to housing, in particular, affordable, social housing and increasing the density of housing on housing sites.

Oxford needs to do more to meet its own housing needs.

Part B form 2 of 4 from

Alexandra Gallaher

1. To which part of the document does this representation relate?

Policy E2

151.2
617

2. Do you consider the Proposed Submission Plan to be

Unsound

3. If you consider the Document Unsound, is this because it is: (choose one or more)

Not Justified

Not Effective

Not consistent with National Policy

4. Reasons why the plan is uncompliant and/or unsound

The presence of large employers such as the highly important Universities and Hospitals put further pressure on the local housing market. Some of the activities of these employers are undertaken outside of the City and these could be decentralised even more. This could mean the development of sites in the City for activities which need to be within the City including housing.

5. What changes are needed

The policy should embrace the requirement for these large employers to work with the City Council to identify relocation potential as well as a limit on numbers.

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Part B form 3 of 4 from

Alexandra Gallaher

1. To which part of the document does this representation relate?

1513
616

Paras 3.4 - 3.12
Policy H1

2. Do you consider the Proposed Submission Plan to be

UNSOUND

3. If you consider the Document Unsound, is this because it is:

- Not Justified
- Not Effective
- Not consistent with National Policy

4. Reasons why the plan is uncompliant and/or unsound

The Oxford City Local Plan is the penultimate one of the Oxfordshire District Local Plans to be submitted. How can this be when the others are predicated on the assessment of housing need in this Plan?

This assessment is almost double what it should be. The original figures used in the preparation of the Local Plan were based on an Assessed Need of 1,400 dwellings pa and were used by the Oxfordshire Growth Board when assessing the scale of need and then the apportionment of 'overspill' to the Districts. However, a recent study by the same consultants who produced the original assessment in 2014 shows that this need has now fallen to around 750 dwellings pa – in line with the Government's recent figures.

By the City sticking to the much higher and out of date figure it demonstrates that it has effectively ignored the more recent research commissioned.

Were the City to adopt realistic housing need figures, allow housing on unused sites in the City and at suitably high densities, the need for surrounding councils to be burdened with the 'unmet need' would probably be removed.

This Plan causes large areas of Oxfordshire land to be built upon. The Cherwell Local Plan allocates vast areas of Green Belt for housing near Oxford, including the historic North Oxford Golf Course. **It is disturbing that the City Policy G1 protects recreation facilities, whereas the City representations on the Cherwell Local Plan agrees with the allocation for housing on North Oxford Golf Course**

immediately adjoining the City boundary. Oxford City, correctly, does not propose for the development of Southfield (now Oxford) Golf Course for housing.

5. What changes are needed

Assumed housing densities are too low and sites have been protected unnecessarily for employment purposes.

The housing need figures should be re-assessed and significantly reduced in line with the latest GL Hearn research and revised Government figures.

Policy H1 should re-allocate for housing sites which have been protected for employment, and set minimum densities much higher than those which appear to have been assumed.

The results of the actions suggested should lead to the Local Plans still at the submission stage to be paused and a review by the Oxfordshire Growth Board, taking into account the most up to date need figures.