

Oxford Local Plan 2036 Main Modifications

Question 1.

Your Name: Suzanne McIvor

Question 2.

Your organisation (if applicable): Cherwell Development Watch Alliance

Question 3.

Your Address: [REDACTED], Oxford, [REDACTED]

Question 4.

Your email address: [REDACTED]

Question 5.

Do you wish to be notified when the Oxford Local Plan 2036 is adopted by the Council?

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Yes

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No

Question 6.

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 2036 Main Modifications Consultation only, and we will only store your data until the Oxford Local Plan 2036 is adopted. Information you give in this form will be shared with the Independent Examiners.

Please note: Anonymous representations may not be accepted.

Select at least 1 option.

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Select this box if you are happy for us to state your name and the first line of your address and postcode when publishing your response(s).

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Select this box if you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured.

Question 7.

To which Modification(s) or part(s) of the Sustainability Appraisal does this response relate?

MM3, Policy E1

Question 8.

Do you Support or Object the proposed modification(s)?

You must provide an answer to this question.

- Support
- **Object**

Question 9.

If you object, please state why:

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182). Please tick any which apply:

- Not positively prepared - i.e. the strategy will not meet development needs
- Not justified - i.e. there is no evidence to justify the modification
- Not effective - i.e. it won't work
- Not consistent with national policy - i.e. does not comply with the law

Question 10.

Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification(s) or part(s) of the Sustainability Appraisal of the Main Modifications.

Employment Categories: In the draft plan submitted to the Inspectors for examination there was no definition of Category 3 employment sites and at the examination the Council confirmed that they do not hold a list of these sites.

The definition of a Category 3 employment site, as proposed in MM3 is effectively any site which is not a Category 1 or Category 2 site. This definition by exception is unsatisfactory and gives rise to a great deal of uncertainty as to what sites might be included eg where there is mixed use and other types of use than B1 and B2.

There is no legal definition of an employment site that we are aware of, so in the absence of a list of Category 3 employment sites, a clear definition of such a site is necessary.

Category 3 sites: During the examination Mr Bore indicated he was concerned that the Council was not being flexible enough in terms of Category 3 employment sites. He robustly questioned whether housing should be given a higher priority, especially with such a significant area of Green Belt being put forward for development. Mr Bore also said that the Category 3 element of the employment policy E1 was too negative.

The Council's main modification for Category 3 sites, in our opinion, remains far too negative. It also introduces four entirely new criteria to be considered in any planning application for change of use to residential. There were only two criteria in the original plan and they were at least fact led rather than based on opinion as in the proposed modification. These new criteria are drafted in such a way that the Council will be able to make use of the policy's requirement for 'a balanced judgement' to block applications to release land for new housing and to continue to protect these sites for employment.

MM3 does not prioritise housing and is certainly not in line with what the Inspector requested.

We believe the Council should be actively promoting the conversion of redundant or under-used commercial property to housing within the City and MM3 should be re-drafted to include a presumption in favour of development for Category 3 sites. If this is not possible MM3 should be re-drafted so the balance is weighted in favour of development. It is unreasonable of the Council to retain the *caveat* which is effectively provided by the opportunity to exercise a 'balanced judgement'. It would however be reasonable to include some criteria along the lines of those currently included in the MM.

11.

Summary of Representation:

If your reason for support or objection is longer than 100 words, please summarise the main issues raised.