



Oxford Local Plan 2036 Main Modifications Consultation Response Form

Please note this form has two parts:

Part A – Your details

Part B – Your consultation response

Please ensure you complete **both** parts of the form. Where possible, we would prefer responses are provided using our online consultation system econsult. To respond in this way, please follow this link: www.oxford.gov.uk/mainmods

Responses should be limited to the Main Modifications and the Sustainability Appraisal of the Main Modifications. Comments will be considered by the independent Planning Inspectors undertaking the examination of both Local Plans

**All responses must be received by 4pm on 27th March
2020 to:**

Planning Policy

Oxford City Council
St Aldate's Chambers
109-113 St Aldate's
Oxford
OX1 1DS

Email: planningpolicy@oxford.gov.uk

PART A – Your details

Please note: we cannot register your representation without your details.

Your Name:	
Organisation (if applicable):	
Address:	
Email:	
Date:	

<p>Do you wish to be notified when the Oxford Local Plan 2036 is adopted by the Council?</p>	<p>YES <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p>
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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.

If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box:	<input type="checkbox"/>
If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box:	<input type="checkbox"/>

PART B – Your response

To which Modification(s) or part(s) of the Sustainability Appraisal does this response relate?	
Local Plan Modification Number(s) (Please state)	
Or, if you are commenting on the Sustainability Appraisal of the Main Modifications, please state which part(s):	

Do you Support or Object the proposed modification(s)? (Please tick)	
SUPPORT	<input type="checkbox"/>
OBJECT	<input type="checkbox"/>

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. strategy will not meet development needs	<input type="checkbox"/>
Not justified - i.e. there is no evidence to justify the modification	<input type="checkbox"/>
Not effective - i.e. it won’t work	<input type="checkbox"/>
Not consistent with national policy - i.e. doesn’t comply with the law	<input type="checkbox"/>

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. *(continue on separate A4 sheet(s) if necessary)*

Technical Note in response to Oxford City Council's Schedule of Main Modifications**i. Introduction**

- 1.1 This Technical Note responds to Oxford City Council's (OCC) Schedule of Main Modifications, published for consultation between 14 February and 27 March 2020. Our response is made on behalf of L&Q Estates and Brasenose College
- 1.2 The Main Modifications (MMs) follow the publication of the examining Inspectors 'interim conclusions' on some of the key issues which arose in the examination hearings.
- 1.3 Specifically, we respond to the proposed 'stepped trajectory' for the delivery of housing over the Plan period as set out in Main Modification 6 (MM6).

ii. Policy H1: The scale of new housing provision (Main Modification 6 – MM6)

- 1.4 Following examination of the Oxford City Local Plan, the Inspectors' interim conclusions stated "*it is our preliminary view that no main modifications are required in respect of the plan's assessments of overall housing need or affordable housing need, or in respect of the annual need figure of 1,400 dwellings per annum over the plan period from 2016 to 2036.*"¹ Barton Willmore support this view in respect of the overall housing need for Oxford City.
- 1.5 As the Inspectors noted in their interim conclusions, the resulting housing requirement is 'capacity-based' due to the obvious restrictions on available land within the City's administrative boundaries. A significant proportion of the need for Oxford City is therefore to be delivered by the surrounding local authorities in the wider county of Oxfordshire.
- 1.6 How this unmet need from Oxford City is delivered by neighbouring authorities is set out on page 21 of the MMs, under reference MM6. In total, 14,300 dwellings of Oxford City's housing need will be delivered in the four neighbouring authorities by 2031.

¹ Paragraph 3, page 1, Examination into the Oxford Local Plan 2036, IC9 – Inspectors' interim conclusions

- 1.7 Barton Willmore do not question the conclusions on housing need and how this has been established for Oxford City, or how it will be delivered across the wider area of Oxfordshire and the four other local authorities within the County.
- 1.8 However, we have concerns with how the agreed requirement for Oxford City (increased in MM6 from 8,620 to 10,884 dwellings, 2016-2036²) will be delivered.
- 1.9 MM6 confirms that the agreed 10,884 dwelling requirement (2016-2036) for Oxford City will now be delivered through a stepped trajectory. This a significant modification from the submitted Plan, which intended to deliver the requirement on an average basis throughout the Plan period.
- 1.10 Our concern with this approach is that the established need will continue to not be met. This is best illustrated in Table 1 below:

Table 1: Results of Main Modification 6

Year	Annualised Requirement over 20 years	Stepped Trajectory Requirement	Shortfall against average need over 20 years	Cumulative shortfall
2016/17	544	475	69	69
2017/18	544	475	69	138
2018/19	544	475	69	207
2019/20	544	475	69	276
2020/21	544	475	69	345

- 1.11 As Table 1 illustrates, assuming the reduced requirement (475 dpa) is delivered in full between 2016/17 and 2020/21, there will be a minimum 345 dwellings shortfall against an agreed level of need. However, by assuming a stepped trajectory with a lower figure at the start of the Plan period, there is the added potential of the lower figure not being met and the shortfall in need being higher than 345 dwellings early in the Plan period.
- 1.12 In this context we would like it recorded that Barton Willmore object to the stepped requirement proposed in MM6, albeit we understand that it will be problematic for Oxford City Council to achieve a 5-year housing land supply without it.

² MM6, Page 20, Schedule of Proposed Main Modifications, February 2020

- 1.13 In this context we would object to any of the neighbouring authorities also attempting to implement a stepped trajectory. It is essential that the four neighbouring authorities to Oxford City plan to meet their own need and unmet need as it arises to avoid prolonging the housing crisis in Oxfordshire.