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| South Black and White Logo | **South Oxfordshire Local Plan 2033**  Publication Version  Representation Form | | | | | | | | **Ref:**  **(For official use only)** | |  | |
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| **Name of the Local Plan to which this representation relates:** | | | | | | | | South Oxfordshire Local Plan 2033 | | |
| **Please return by** **5pm on Thursday 30 November 2017 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) | | | | | | | | | | |
| This form has two parts:  **Part A** – Personal Details  **Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make. | | | | | | | | | | |
| **Part A** | | | | | | | | | | |
| 1. Personal Details\* | |  |  |  |  |  | 2. Agent’s Details (if applicable) | | |  | |
| \*If an agent is appointed, please complete only the Title, Name and Organisation  boxes below but complete the full contact details of the agent in 2. | | | | | | | | | | |  | |
| Title | | Mrs | | |  |  | | | | |
|  | | | | | |  | | | | |
| First Name | | Helen | | |  |  | | | | |
|  | | | | | |  | | | | |
| Last Name | | Marshall | | |  |  | | | | |
|  | | | | | |  | | | | |
| Job Title (where relevant) | | Director | | |  |  | | | | |
|  | | | | | |  | | | | |
| Organisation representing | | CPRE Oxfordshire | | |  |  | | | | |
| (where relevant) | | | | | |  | | | | |
| Address Line 1 | | 20 High Street | | |  |  | | | | |
|  | | | | | |  | | | | |
| Address Line 2 | |  | | |  |  | | | | |
|  | | | | | |  | | | | |
| Address Line 3 | |  | | |  |  | | | | |
|  | | | | | |  | | | | |
| Postal Town | | Watlington | | |  |  | | | | |
|  | | | | | |  | | | | |
| Post Code | | OX49 5PY | | |  |  | | | | |
|  | | | | | |  | | | | |
| Telephone Number | | 01491 612079 | | |  |  | | | | |
|  | | | | | |  | | | | |
| Email Address | | director@cpreoxon.org.uk | | |  |  | | | | |
| **Sharing your details**: please see page 3 | | | | | |  | | | | |

**Part B – Please use a separate sheet for each representation**

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

**STRAT 3**

4. Do you consider the Local Plan is: (*Please tick as appropriate)*

4. (1) Legally compliant Yes

4. (2) Sound **NO**

4. (3) Complies with the Duty to Cooperate Yes

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| 5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments. |
| **STRAT 3 The unmet housing requirements from Oxford City**  The 3,750 houses for Oxford’s unmet need are based on no evidence at all. There cannot be a duty to co-operate to meet the City’s need because the City has not defined it in any consistent way and much less have it tested. The City has made no prediction of how many houses it needs nor of how many it could build itself. Even its current draft local plan contains no such hard numbers.  CPRE’s submission to that plan shows that if Oxford used land it is earmarking for yet more employment (which would cause yet more commuting and housing need of course) for housing instead, and built at densities appropriate to a City, it could accommodate 26,000 houses which would be its full need identified by SHMA.  What’s more, the new official Government need calculation, based on work by our own MP John Howell, replaces the SHMA, and shows that Oxford in fact needs only 15,000 houses, half the level the discredited SHMA had forecast. On our calculations Oxford could not only build all those itself but have land left over for the next plan cycle as well.  Not only is there no evidenced need for SODC to provide houses for Oxford at all, but the figure SODC is using is not even the guessed number allocated by the shadowy Growth Board (the clue is in the name). There is no evidence that any houses are needed at all, much less the arbitrary 3750, and it is unsound for the Plan to contain them.  (Continue on page 4 /expand box if necessary) |

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| 6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. |
| The allocation of 3,750 houses for Oxford’s ‘unmet need’ should be removed from the plan. This could be re-assessed when the new housing methodology (OAN) report is confirmed by Government and Oxford City has developed and agreed its own plan.  (Continue on page 4 /expand box if necessary) |

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**Yes**, I wish to participate at the

oral examination

YES

|  |
| --- |
| 8. If you wish to participate at the oral part of the examination, please outline why  you consider this to be necessary:  CPRE represents the views of its members across the District, is well-informed on the issues and would very much wish to contribute to any related discussion. |
| ***Please note*** *the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.* |

Signature: Date:

**Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by South Oxfordshire District Council for a period of 6 months after the Local Plan is adopted.

**Would you like to hear from us in the future?**

✓

I would like to be kept informed about the progress of the Local Plan

✓

I would like to be added to the database to receive general planning updates

Please do not contact me again

**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 contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)

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