

Comment

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Comment by	Dijkman Planning LLP (Mr Ken Dijkman)
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Q1 Do you consider the Local Plan is Legally Compliant? Yes

Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified) No

If your comment(s) relate to a specific site within a core policy please select this from the drop down list. N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? No

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Housing Supply Ring Fence (Core Policy 5) It is anticipated that the Inspector will receive objections to the proposed ring fence on the basis that this is an artificial way of seeking to isolate the rest of the District from the (obviously anticipated) potential failures to deliver houses within very large sites in a timely and effective manner. Officers have openly acknowledged that this approach has been borrowed from the neighbouring authority, South Oxfordshire District Council. That District has been able to isolate the housing delivery problems around Didcot from the rest of the rural area and so seek to avoid the consequences of Paragraph 14 of the NPPF. But SODC's sub area was agreed Pre-NPPF and based solely upon the now revoked South-East Plan Sub Regional Strategy. In the absence of high-level sub regional justification the housing supply ring fence is demonstrably contrary to the NPPF requirement that local plans should meet the full objectively assessed need for market and affordable housing in the housing market area. There is no evidence that the proposed ring fenced part of the district constitutes a distinct or identifiable housing market area. In this context suitable potential alternative smaller strategic allocations or 200 should be identified which are demonstrably deliverable early in the plan period.

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.

Q6 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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Land at east Challow constitutes a significantly more sustainable and deliverable proposal than those allocated in more sensitive and less sustainable locations elsewhere (sites 1,2,3,4 12 & 13). The overall Soundness of the plan is compromised by: 1. the lack of acceptance that unmet housing need increases the quantum of 5 year land supply, 2. by allocations with Green Belt and AONB locations when sustainable alternatives are demonstrably available 3. Reliance upon an artificial 'ring fence' related to housing delivery through major allocations, a mechanism that is considered necessary because their deliverability is in doubt. These three issues render the plan unsound and contrary to Government Policy. These matters require open debate and discussion as do the merits of the site at East Challow which is being proposed as a way of helping to establish a Sound Plan.