## Comment

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Publication

Comment by Dijkman Planning LLP (Mr Ken Dijksman)

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Consultation Point Core Policy 4: Meeting Our Housing Needs ( <u>View</u>

)

**Status** Submitted

Submission Type Email

Version 0.4

Files OXGC Description for LP Part 1.pdf

Concept Plan OXGC.pdf
Location Plan OXGC.pdf
Letchworth on OXGC Site.pdf
Land Budget Plan OXGC.pdf

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 N/A a core policy please select this from the drop down list.

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 No the Duty to Co-operate?

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.

The overall Soundness of the plan is wholly compromised by: 1. the lack of acceptance that unmet housing need within Oxford City will have profound long term strategic consequences for growth within this area. 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.

Oxford Garden City offers an unparalleled opportunity to approach the issue of sustainable economic growth strategically and holistically. The safeguarding of land for the Upper Thames reservoir is unjustified and an attempt to prevent Oxford Garden City from coming forward.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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 plan should be modified to remove all Green Belt and AONB allocations and to include an absolute requirement to undertake an early review to consider Oxford Garden City as a potential Area Action Plan solution to environmental and infrastructure constraints upon sustainable patterns of growth in central Oxfordshire in general and Science Vale in particular.

**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, Yes - I wish to participate at the oral examination do you consider it necessary to participate at the oral part of the 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:

Oxford Garden city has been misunderstood in terms of its potential top deliver many of the aspirations for economic, infrastructure and housing delivery set out within the plan, after the first five years of the plan period. Oxford Garden City cannot happen without collaboration and positive engagement between the various stakeholders. Including Thames Water, The Highways Agency, National Rail, Science Vale

Oxford, Oxfordshire Local Enterprise Partnership and all other key organisations operating within this area. Attendance at the EIP is necessary as this is the correct forum to debate how the potential of this site can be explored as a solution to mid period Local Plan delivery issues without undermining or compromising the general strategy. The soundness of the plan is in serious question bearing in mind the artificial ring-fence which seeks to buy time for the master planning of several unsustainably located major sites whose delivery and timescales are uncertain. The duty to co-operate cannot be dealt with by a modification, the acknowledgement of the need for a local plan review can be recommended by the Inspector.