

# South Oxfordshire Local Plan 2034

## Page 3: Part A - contact details

Q1. Are you responding as an:

Agent

## Page 5: Agent contact details

Q3. Due to the plan-making process including an independent examination, a name and means of contact is required for your comments to be considered. As you are acting on behalf of another organisation, you need to provide their details in the first box but your company name and contact details thereafter.

**Organisation representing** A G Hedges Farms Ltd and Strange Family

**Agent name** Green and Co

**Contact name** Laura Hudson

**Agent address line 1** [REDACTED]

**Agent address line 2** -

**Agent address line 3** -

**Agent postal town** [REDACTED]

**Agent postcode** [REDACTED]

**Agent telephone number** -

**Agent email address** [REDACTED]

## Page 7: Part B - your comments

Q5. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies [here](#). If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** Local Plan Policy STRAT1

Q6. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?		X		
comply with the Duty to Co-operate?	X			

Q7. Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

Policy STRAT 1

Whilst we support the overall strategy, particularly with regard to focusing new development in Science Vale including Didcot Garden Town, it is not considered that the plan adheres to this strategy.

Didcot is a key growth area, with Garden Town Status, and which rightly should be the focus for significant additional development. It falls within the Science Vale employment area earmarked for significant employment growth in addition to being located on a mainline railway with easy access to London.

Whilst the plan proposes some development in the town, the numbers are overly reliant on previous allocations and it is not considered that the current level of proposed development takes into account its strategic location and recent enhanced growth status. Instead the plan proposes a number of large strategic allocations on the edge of Oxford within the Green Belt to meet the City's unmet need without sufficient justification.

It is therefore considered that the plan is unsound in its implementation of the proposed strategy set out in STRAT 1, and fails the tests of being justified and effective set out in para 35 of the NPPF.

Q8. Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

In order to address the concerns and for the plan to adhere to the strategy set out in STRAT 1 the plan needs to re-assess the over reliance on green belt allocations and include additional housing in Didcot commensurate with the level of growth expected from its central, strategic location within Science Vale and the District as a whole.

Comments in relation to Policy H2 will set out an alternative option.

Q10. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q11. Would you like to comment on another policy or paragraph?

Yes

## Page 9: Part B - your comments

Q12. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies [here](#). If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** Local Plan Policy STRAT 6, STRAT 11, 12 and 13

Q13. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?		X		
comply with the Duty to Co-operate?	X			

Q14. Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

Policy STRAT 6 refers to development within the Green Belt and sets out significant allocations which require the release of land around Oxford's perimeter. These are intended to address a proportion of the City's unmet need.

In order to justify the release of Green Belt exceptional circumstances should be fully evidenced and justified. In this regard the plan must demonstrate that all other reasonable options and alternatives for meeting its identified need have been explored.

It is not considered that this has been done. There is no specific requirement for Oxford's unmet need to be provided in such close proximity to the City and this is not considered sufficient to justify the release of Green Belt land. In this regard the plan is considered to be unsound and does not meet the tests of paragraph 35 of the NPPF.

Q15. Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

Remove allocations referred to as STRAT 11, 12 and 13 as it is not considered that they have been sufficiently justified given the availability of alternative sites which have not been sufficiently explored.

An viable alternative will be put forward in comments to Policy H2.

Q17. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q18. Would you like to comment on another policy or paragraph?

Yes

Q19. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

**Document / Policy / Paragraph:** Policy H2

Q20. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?	X			
are sound?		X		
comply with the Duty to Co-operate?	X			

Q21. Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

Policy H2 sets out the proportion of dwellings to be provided in Didcot within the plan period amounting to 6503 dwellings. A large proportion of these are on sites allocated in previous plans and which have not been delivered at the expected rate.

Given the location of Didcot strategically within the District, the level of recent growth and investment, its status within the Science Vale employment area and as a Garden Town with a requirement to accommodate significant future growth, it is considered that further housing sites should be allocated here.

Without the unjustified Green Belt allocations o mete Oxford unmet need and with the uncertainty surrounding the delivery of Chalgrove Airfield it is considered that the plan will not meet it required housing need. The plan does not therefore meet the soundness tests set out in NPPF para 35.

Q22. Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

In order to address the above concerns it is considered necessary to allocate additional housing in Didcot. Some of this could be accommodated on the following site.

Land at Abingdon Road, Didcot

This site is located on the north eastern edge of Didcot (plan attached). The land to the west of the site is allocated and has outline planning permission for 1880 dwellings and associated retail and employment uses which was granted in June 2017 (Ref: P15/S2902/O).

The site is undeveloped and consists of agricultural land permeated by trees and hedgerows. Hadden Hill golf course lies adjacent to the south and part of the eastern boundaries. In terms of planning constraints, the site is flood zone 1 the lowest risk category and falls outside the green belt and AONB, although the AONB boundary runs along the eastern edge of the site. There are no heritage assets in close proximity to the site.

The land is currently located outside the current Didcot Development Boundary but is included in the designated masterplan area for the Garden Town and is well related to the existing and emerging built up area of the town. Furthermore the site is located immediately adjacent to the safeguarded Northern Didcot Perimeter Road route.

The site extends to 14.8ha and could in theory accommodate in the region of 777 homes if developed at the local plan recommended density for Didcot of 70 dph. However given the edge of settlement location and proximity to the AONB it is considered that 45ph to be more realistic resulting in the provision of around 500 homes. The site is available and can be delivered quickly.

Didcot is an area of significant growth and through its designation as a Garden Town is set to deliver 15,050 homes and 20,000 high tech jobs over the next 20 years.

The site is therefore well placed to meet these growth requirements which it is not considered the current plan does.

Q23. Please upload any supporting documents below:

- File: Land at Abingdon Road Didcot Oxfordshire (002).pdf - [Download](#)

Q24. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q25. Would you like to comment on another policy or paragraph?

No

Q354. As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es) below:

I would like to be added to the database to receive planning policy updates for South Oxfordshire

I would like to be added to the database to receive planning policy updates for Vale of White Horse