

# South Oxfordshire Local Plan 2034

## Publication Version Representation Form

**Please return by 5pm on Monday 18 February 2019 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)

This form has two parts:

**Part A** – contact details

**Part B** – your comments / participation at oral examination

### Part A

Are you responding as an: (please tick)

Agent

Business or organisation

Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

	1. Personal Details	2. Agent Details (if applicable)
Title	<input type="text" value="Dr"/>	<input type="text"/>
Full Name	<input type="text" value="David Adams"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Parish Councillor - Sandhills"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="██████████"/>	<input type="text"/>
Address Line 2	<input type="text" value="██████"/>	<input type="text"/>
Address Line 3	<input type="text" value="██████████"/>	<input type="text"/>
Postal Town	<input type="text" value="██████"/>	<input type="text"/>
Postcode	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text" value="████████████████████"/>	<input type="text"/>
Email Address	<input type="text" value="████████████████████"/>	<input type="text"/>

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

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

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 STRAT 13: Land North of Bayswater Brook (LNBB)

Do you consider the Local Plan and supporting documents:

(1) are legally compliant

Yes

No

Don't know

(2) are sound

Yes

No

Don't know

(3) comply with the Duty to Cooperate

Yes

No

Don't know

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.

### Q1: Legally Compliant

- SODC has made no attempt to contact Risinghurst & Sandhills Parish Council, prior to the publication of LP2034 in January 2019, concerning the proposed housing development on Bayswater Farm Field (BFF) with access through Burdell and Delbush Avenues, both of which reside in this parish.
- For BFF site, no background studies or impact assessments have been undertaken with relevance to access, safety, traffic congestion (pollution/air quality), infrastructure (particularly schooling), environmental and biodiversity (ref NPPF 2018).
- Cont. p4

(Continue on page 4 if necessary)

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 STRAT 13 LNBB from the SODC LP 2034 as the new homes proposed to be built in the Green Belt are not required to meet Oxford City's unmet needs; prevents further city sprawl by using Green Belt Land
- Remove Bayswater Farm Field (BFF) from the proposal – this would negate the “not legally compliant” issue from the Plan for this specific site due to no consultation (NFFP Regulation 18).

(Continue on page 4 if necessary)

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

Yes  No

\* **Please note:** the inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the public hearing.

Signature:  Date: 16 February 2019  
*(this can be electronic)*

### Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the planning inspector and programme officer will be kept securely and not used for any other purpose. The inspector and programme officer will retain the data up to six months after the plan has been adopted. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit

[www.southoxon.gov.uk/dataprotection](http://www.southoxon.gov.uk/dataprotection)

### Future contact preferences

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):

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

**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.**

**Q1: Legally Compliant (cont.)**

- The National Planning Policy Framework (NPPF 2018) clearly states in §25 “*Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies ...*”. Clearly SODC has not undertaken cross-boundary consultation or community involvement before publication of LP 2034, ie consultation under Regulation 18 has not taken place.
- The SODC LP 2034 is a new plan when compared to LP 2033 with many more new sites proposed for housing development with a significant increase in overall housing numbers. No Section 18 consultation has taken place with those parties affected which is in total contravention to the correct (legal) process that should have taken place.
- The unmet housing need for Oxford City has not been undertaken using the latest Government methodology which should have been used.

**For the reasons outlined above, the SODC LP 2034 for Policy STRAT 13 LNBB is Not Legally Compliant.**

**Q2: Soundness**

**SAFETY**

- The opening of Burdell and Delbush Avenues to enable access to Bayswater Farm Field (referred to Plot 2c in *Green Belt Assessment of Strategic Sites in South Oxfordshire*) and part of STRAT 13 – Land North of Bayswater Brook (LNBB)) and as indicated by the Dorchester Residential Management Option 3 plan (<https://www.bayswateroxford.co.uk/proposals/2900-homes/>), will increase the number of cars passing through these two roads by 200+ car journeys/day with the subsequent consequence of danger to children and parents using the Bridle Path (FP215/8) to walk from Barton to Sandhills Community School.
- The increase in the number of cars will cause more congestion at the Thornhill/A40 junction where again parents use the footpath to take their children from Risinghurst to Sandhills Community School.
- Terrett Avenue is already a bottleneck in the mornings and evenings as parents drop-off/pick up their children to/from school – additional traffic will exacerbate this safety problem.
- Burdell and Dellbush Avenues are narrow roads, established in the mid 1930’s when cars were small and less powerful and driven at much slower speeds than those currently. At present, both roads are cul-de-sacs which means there is no through traffic and generally residents drive at a reasonably slow speeds to go to and from their houses. Opening these 2 roads to through traffic will greatly increase the chance of accidents to pedestrians, in particular, to children on their way to/from school.
- There is a small Care Home on the corner of Burdell Avenue and Hill View which houses 5 residents who frequently are taken out along the surrounding roads and bridle path to walk and get “some fresh air”. With the two roads open to through traffic this increases the potential danger to these residents when out and about.
- No safety impact assessment has been undertaken to quantify the effect of opening Burdell and Delbush Avenues to traffic for access to the BFF site, and the adequacy of these two roads to cater for the increase in traffic.

## INFRASTRUCTURE / CONGESTION / POLLUTION

- The addition of 160+ houses in the STRAT 13: LNBB Bayswater Farm proposal would increase the volume of traffic onto the Thornhill/A40 junction.
- No traffic surveys/impact studies have been undertaken to assess the effect on the residents of Sandhills of opening Burdell and Delbush Avenues to traffic. No safety study has been undertaken.
- Oxford already has high pollution levels; additional traffic, particularly at peak times will make the problem worse in the vicinity of Green Road roundabout, A40, London Road, Headington and Bayswater Road, Barton.
- If the proposed relief road from Marsh Lane to Bayswater Road goes ahead, it will be used as a short cut (rat run) to avoid Green Road roundabout. Traffic will then be diverted onto Bayswater Road northwards onto the B4027 Islip-Stanton St John road through Forest Hill and onto the A40 east bound.
- If the extension to this road is completed from Bayswater Road, around the north of Sandhills onto the A40, even more traffic will use this “relief road” to avoid Green Road roundabout. This will result in excessive traffic going through the new housing development centred on Elsfield and Wick Farm causing safety concerns, much pollution, traffic noise, congestion through an urban area.
- The addition of 160+ houses on the BFF site will raise the requirement for additional school places both at primary and secondary level. Sandhills Community School is already fully allocated. There is no evidence in the LP 2034 that a site-specific study/assessment has been undertaken to identify how these additional places will be catered for. Any educational establishment remote from BFF to satisfy this need and not in easy walking distance will result in more car journeys on already narrow roads not fit for through traffic. The LP does not put forward what developer funded infrastructure will be forthcoming to mitigate this issue.

## GREEN BELT

- Policy STRAT 13 LNNB proposes to build houses in the Green Belt across the area from Marsh Lane to Bayswater Road north of Barton Park and Barton Estate. The Elsfield and Wick Farm areas are rated as “high level of harm” to the Green Belt if used for housing (ref Green Belt Assessment of Strategic Sites on South Oxfordshire, Jan 2019). For both sites it is stated: *“Development within the parcel would therefore lead to significant harm in relation to urban sprawl, encroachment on the countryside and to the setting and special character of Oxford”*.
- The development of Barton Park has pushed wildlife habitats (including those of badgers) north of Bayswater Brook into the area now proposed for development and encroaching on the SSSI’s at Sidlings Copse and College Pond. No Impact Appraisal has been undertaken to assess the effect on these two SSSI’s despite previous statements by SODC stating that these Impact Appraisals ought to be done.
- Bayswater Farm Field north of Sandhills (Plot 2c in *Green Belt Assessment of Strategic Sites on South Oxfordshire, Jan 2019*) but **south** of Bayswater Brook and adjacent to the bridle path is also currently situated in the Green Belt. Its removal from the Green Belt is rated “Low Moderate” in this report. However, for the residents of Sandhills this is a most important area of green space. Indeed, Bayswater Brook *is designated as a Site of Local Importance to Nature Conservation in the Oxford City Local Plan* (see LP 2034 §4.113).
- The safe use of the bridle path and access to it will be severely compromised by being crossed in two places by the main access routes through, for the 300 or so cars travelling from the BFF site within the Green Belt, putting at risk the many users of the Bridle path.
- The NPPF states that the use of Green Belt for housing should only be undertaken as a last resort, under “exceptional circumstances”. As LP 2034 makes provision for more than enough houses without

the need for STRAT 13: LNBB development, then it should be removed from the plan as this housing is unnecessary.

### WELLBEING & MENTAL HEALTH

- Sandhills has no amenities (only corner shop closed in 2016) EXCEPT access to the Bridle Path and the adjacent Barton Farm field (BFF) and view to Bayswater Brook. The residents of Barton and Sandhills continuously use the Bridle Path for exercise and to walk their dogs, this experience is enhanced by the relative quiet (no through traffic) and the splendid views northwards (see photographs below).

#### Views of Bayswater Farm Field from Burdell Avenue



- The Forest School, part of Sandhills Community School, greatly benefits from the proximity of BFF and the accompanying wildlife and fauna. Red deer, muntjacs and other animals are frequently seen in the field, together with an abundant birdlife. All this contributes to the wellbeing of the children and the community in general.
- Previous proposals to build on BFF have been turned down in 1961, 1973 and 1989 because (i) "... it is designated as one of **outstanding natural beauty** and the development would **be detrimental to the amenities of the locality and the rural landscape**", (ii) " .. there would be an unquantifiable loss of amenity", and (iii) ".. This site is not allocated for housing and would **undesirably extend the limits of Sandhills into the attractive open countryside adjacent to Bayswater Brook IN AN AREA OF GREAT**

**LANDSCAPE VALUE** - we will seek to conserve and enhance the quality of the landscape and protect it from development of this site for residential purposes that would have a serious effect on the character and appearance. This large scale development would be **contrary to Green Belt policy** and **there is no justification for an extension of residential development beyond the clearly defined limits of Sandhills into the attractive open countryside beyond**".

- Burdell and Delbush Avenues are narrow tree-lined roads which are a fundamental characteristic of Sandhills Estate – any change to these roads (widening, removal of trees) to enable access to the new development of BFF would totally change this to the detriment of all residents.
- Sandhills needs an **OPEN SPACE**, Bayswater Farm Field fulfils this requirement. The loss to residents would be a disaster!

### **HOUSING NEEDS**

- The housing needs for SODC outlined in this SODC LP 2034 have reduced the number of houses required compared to their previous plan SODC LP 2033 (2017). Therefore, the use of Green Belt land should be rejected as there are sufficient sites elsewhere to meet the housing requirement.
- The number of houses required to meet Oxford City's unmet needs: the Strategic Housing Market Assessment (SHMA) calculations are for 22,775 new homes, yet this LP includes provision for 28,459 new homes, hence the need for LNBB's 1,100 homes and in particular for BFF's allocation of 160-200 new homes unnecessary.
- Oxford City's Local Plan has yet to be reviewed by a Planning Inspector therefore the degree of unmet need is unknown.
- The inclusion of land in the Green Belt adjoining Oxford City (OC) has been made to satisfy some of Oxford City's unmet need for housing, yet it is estimated that OC has sufficient land within the city limits to build up to 30,000 houses if housing needs took priority over other land usage.
- Proximity to OC (ie building in the Green Belt) is justified by good connectivity (bus, cycling and walking) into the city, yet already transport links into the City by bus from the east via Green Road Roundabout are logjammed at rush hour times in the mornings and evenings. Additional traffic will exacerbate this situation. There has been a lack of Impact Assessments to test viability of this proposal.
- Access across the A40 at Barton Park for cyclists and pedestrians has yet to be resolved because of the reluctance of OC and developers to build a suitable means (bridge or underpass) for crossing the road. The current pelican crossing is unsafe for large numbers of cyclists and pedestrians. Marsh Lane, at the west end of the proposal, is currently unsafe for cyclists. Again, no Impact Assessment or solution to these problems have been proposed.
- There is no reason why this Green Belt land should be used for housing: good connectivity to Oxford is possible at a number of locations in Oxfordshire by train, which is the logical solution to mitigate against the already congested roads around the city: A40, A34 and the Oxford ring road.

**For the many reasons stated above, it is concluded that the SODC LP 2034 is unsound with reference to Policy STRAT 13: LNBB.**

### **Q3: Duty to Cooperate**

#### **COOPERATION with OTHER BODIES**

- SODC has made no attempt to contact Risinghurst & Sandhills Parish Council concerning the proposed housing development on Bayswater Farm Field (BFF) which requires access through Burdell and Delbush Avenues which reside in this parish.
- Previous mention of Elsfield and Wick Farm sites' development in SODC's previous Local Plan 2033 dismissed the development of these two sites without them being joined together as one combined site because of lack of access by suitable roads. The inclusion of BFF in the development of Wick Farm has not been mentioned before as a possible development site since 1989 until the publication of SODC LP 2034 in January 2019. This inclusion is only due to same ownership as Wick Farm despite it being totally separate from the proposed Elsfield-Wick Farm development west of Bayswater Road.
- The National Planning Policy Framework (NPPF 2018) states in §25 "*Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies ...*". Clearly SODC has not undertaken cross boundary consultation, ie consultation under Regulation 18 has not taken place with appropriate bodies and interested parties: in particular Risinghurst & Sandhills Parish Council and the residents of Sandhills.

**There has been a distinct lack of Cooperation with the local community of Sandhills!**

**Alternative formats of this form are available on request.** Please email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) or call 01235 422600 (Text phone users add 18001 before you dial).

**Please return this form by 5pm on Monday 18 February 2019 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk).