

# South Oxfordshire Local Plan 2034

## Page 3: Part A - contact details

Q1. Are you responding as an:

Individual

## Page 4: Individual contact details

Q2. Due to the plan-making process including an independent examination, a name and means of contact is required for your comments to be considered:

Title	Mr
Full name	Robin Bennett
Business / Organisation name (if relevant)	-
Job title (if relevant)	-
Address line 1	██████████
Address line 2	████████████████████
Address line 3	-
Postal town	██████████
Postcode	██████████
Telephone number	██████████████
Email address	██████████████████████████████████████

## 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: STRAT2

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.**

This Plan is not legally compliant. It does not meet the consultation requirements as it is a completely new plan from those previously consulted upon. It has higher housing numbers. Furthermore it is not sound as it is not internally consistent. STRAT2 says that 23,000 homes will be planned for. And yet, Table 5c shows that 28,500 are planned."

This Plan does not fulfill the Duty to Cooperate – that duty is to supply land for Oxford's unmet need. Oxford has updated its Objectively Assessed Need and needs half the number of homes compared with the previous target; there is no longer an unmet need for Oxford.

This Plan is not sound. The homes are not deliverable. We would need to build 1,600 homes per year which cannot be achieved. Since 2011, we have been building 600 a year.

Vitally, the plan is seriously out-of-date. It does not acknowledge the current method for assessing Objectively Assessed Need. Our new OAN is for 10,000 homes. This plan has a target for three times as many homes as we need.

**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.**

The existing Core Strategy Local Plan made in 2011 should be re-ratified and kept as our Plan. It plans for sufficient homes to meet our objectively assessed need.

**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:** STRAT6

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.

STRAT6 includes large amounts of Green Belt land that did not appear in earlier plans. This is in contravention of the National Planning Policy Framework which accords very high protection to Green Belt land. It is likely to lead to coalescence of settlements and to large numbers of car-dependent commuters, against the principles of sustainable development.

This new plan with its high housing numbers and completely new allocations of strategic sites should go to full consultation on its substance for reconsideration by the public and Councillors.

The plan is for three times as many homes as we need, according to the up-to-date objectively assessed need. There is no reason to tear up green belt land.

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.

There should be no development in the Green Belt, in accordance with Government policy. Our objectively assessed need has already been met with completed and committed housing developments.

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

## Page 11: Part B - your comments

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: STRAT10

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.

The plans for Berinsfield in STRAT10 are not legally compliant because they represent an entirely new plan covering a much larger area than that in the 2nd preferred options document in 2017. They also include land in Drayton St Leonard parish that was not previously included and the residents of that parish have not been consulted.

The plans are unsound and not positively prepared because any consent assumed from the residents of Berinsfield was based on surveying done presenting a much smaller area of land use and promising that land value uplift funds would be spent in the community; STRAT10 para 3(ii) states "no greater land-take of greenfield land than is necessary to deliver the required regeneration and other relevant policy requirements". This plan includes expenditure towards infrastructure in other locations such as the Golden Balls roundabout and a school at Culham; this is not what was proposed in the consultation with residents.

As previously stated, there should be no unmet need from Oxford and no duty to cooperate.

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.

To make this element of the plan sound, there should be proper consultation of residents of both Berinsfield and Drayton St Leonard and a referendum open to residents of those villages, with further detailed input and support from SODC for Berinsfield to draft their own valid NDP.

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?

Yes

Q26. 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: ENV3

Q27. 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	

Q28. 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.

It is simply not possible for construction in the green belt and on other productive farmland to "conserve, restore and enhance biodiversity in the district" as stated in paragraph 1. Recent science has shown the volume of biodiversity and carbon sequestration in soil: this is not easily recreated on alternative sites and the "net gain" concept is unproven and potentially unsound. Biodiversity does not work like that, and we don't have time to experiment by concreting productive land which is home to a multitude of species.

Q29. 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.

I would like to see the plan redrafted to place environmental and ecosystem preservation as its core intention. This is likely to mean little in the way of construction on a large scale in the district as it is a predominantly rural area.

Q31. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q32. 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