

# 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="Ms"/>	<input type="text"/>
Full Name	<input type="text" value="Lorna Bevan"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<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"/>	<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"/>

For information on **sharing your details**: please see page 3

## 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:

STRAT 13 Bayswater Brook

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.

### 1. LEGAL COMPLIANCE

#### 1.1 NPPF

Main Plan document 2.3. iv) page 15 not compliant with NPPF on Green Belt, also **STRAT 1** , **STRAT 6 Green Belt** not compliant with NPPF – specifically goes against the 5 functions of the Green Belt particularly in relation to the City of Oxford –

- *prevent the unrestricted sprawl of large built-up areas* – the City of Oxford
- *to prevent neighbouring towns merging into one another* – Merges Oxford into surrounding parishes and villages;
- *to assist in safeguarding the countryside from encroachment* – destroys the countryside around Oxford
- *to preserve the setting and special character of historic towns*- destroys the setting of Oxford and surrounding villages
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land* – discourages this and the building of much needed homes within the City of Oxford

Strategic Housing and Economic Land Availability Assessment (SHELAA) (update - January 2019) Pages 6 and 7 list reasons for excluding sites in NPPF – SSSIs, Ancient Woodland, flood zones 2 & 3 NPPF Green Belt – Both Green Belt Studies 2015 and Jan 2019 state that it would be highly harmful to remove Lower Elsfield and Wick Farm from the Green Belt.

#### 1.2 Consultation Process

- Main Document 1.6, 2.11, **STRAT 1**, **STRAT 2 (housing requirement)**– There has been no previous consultation on this Local Plan. It is a new Plan not a modification of the previous version. The housing development numbers have increased substantially from 22,775 to 28,459 with the addition of 3 new Strategic Development Sites increasing it from 4 to 7.
- Main Document 1.6, **Policy STRAT 13: Land north of Bayswater Brook**– in the previous Local Plan Wick Farm and Lower Elsfield were considered, and rejected, as 2 separate sites with no linking road. The new plan has joined them together, added a road and called them a ‘new site’. *Bayswater Farm had not been considered at all previously* and is missing from **Strategic Site Selection Background Paper 2**.
- Main Document 1.6, **STRAT 13 - Bayswater Farm** – has never been subject to a Section 18 consultation.

- The new Local Plan was prepared in a rush. The background documents were not available electronically to the SODC councillors when carrying out the scrutiny process or when the full council voted on it. Few councillors had the opportunity to be fully informed when voting on it.

## 2. DUTY TO COOPERATE

The main reason for choosing Land North of Bayswater Brook and the other Green Belt sites around Oxford is the Duty to Cooperate with Oxford's unmet housing need, and Oxford's request that these should be next to Oxford. However, the housing numbers needed for Oxford are based on an out of date housing need assessment (2014 SHMA rather than the more recent 2018 SHMA). The new official government calculation for Objective Assessed Need reduces both SODC's and Oxford City's need drastically. It is hard to know which figures are true and it feels misleading. Other studies suggest that Oxford has sufficient space and brown-field sites to meet its unmet need, especially the lower 2018 number.

## 3. SOUNDNESS

### 3.1 **The choice of site is unsound.** The Strategic Housing and Economic Land Availability Assessment (SHELAA) (update - January 2019)

Site assessment from 2017 has not been updated in this more recent document. The 2017 document stated that:

1006 - Land at Wick Farm and Lower Elsfield, Oxford (1) - "*Unsuitable - not in accordance with emerging spatial strategy. 10% of site in Flood Zone 3b*"

1007 -Land at Wick Farm and Lower Elsfield, Oxford (2) – "*Unsuitable - not in accordance with emerging spatial strategy. 28% of site in Flood Zone 3, 3% of the site is covered by Ancient Woodland and 3% of the site is covered by two SSSI. (One SSSI and one area of Ancient Woodland overlap but this has been taken*"

No assessment seems to have been done of the flood risks of building houses and a road in this area.

### 3.2 **The reasons given to build on Oxford's Green Belt are unsound,** Strat 2. The reasons do not constitute 'exceptional circumstances'. The Oxford Local Plan 2036 states that 'there is not the capacity with Oxford's administrative boundary to meet all housing need'. However, as stated in 2. above there seem to be other studies which say that Oxford can meet its own unmet need. It has therefore not been clearly proven that Oxford's unmet need is an exceptional circumstance to warrant building on Green Belt. The NPPF requires that the policy-making authority should be able to demonstrate that it has examined fully all other reasonable options before considering changing the Green Belt boundary – I do not believe it has so demonstrated.

### 3.3 **The redefinition of Oxford's Green Belt boundary is unsound** – the boundary of Green Belt is supposed to be defined by a significant geographic feature. The current boundary is Bayswater Brook itself, which I believe meets this requirement. The redefined proposed boundary is marked by some field hedges, barbed wire fencing and an open field. I do not believe these constitute a significant geographic feature.

### 3.4 **The assumptions about proximity (easy access) of new housing to Oxford are unsound.** Strat 2. There are no planned public transport links from the Land North of Bayswater Brook, and only one crossing (for buses only) across the busy A40, making the entire site only realistically accessible by car, via the already over-congested Bayswater Road. No assessment seems to have been done into the traffic, noise or pollution impact of this.

### 3.5 **The assumptions about the desirability of new housing to be on Oxford's outskirts are unsound.** The new housing is likely to be expensive and, being on the East side of Oxford, bought by commuters who will drive the other way towards London, especially if the Elsfield-Forest Hill link road is built through the new housing estate. For people wanting to take up employment in Oxford, especially younger people starting careers or people looking at lower paid jobs, Oxford is unaffordable to either buy or rent, and so many people prefer to live in towns outside of Oxford, served by excellent train services into the city centre, such as Didcot, Thame, Haddenham etc.

### 3.6 **The infrastructure plan is unsound** – cost estimates are around £92 million but no costings have been

included. The costs of this infrastructure would be considerably in excess of £92.5 million, much of which the developer would need to meet. This is not including the fact that the developer would also need to provide for 50% low cost housing. Other costs, eg foot bridge over the A40, and provision of services and facilities would be significant and also borne by the developer. The whole project does not seem viable and there is insufficient detail provided in any of the documents relating to this site. Ref Main Document Trans 2, p154 Trans 4 p158 and Trans 5, p159

**3.7 Heritage Impact Assessment** – there has been none done for any of the strategic sites around Oxford, rendering these plans unsound

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(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.

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:

(this can be electronic)

Date:

18 February 2019

### 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



**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.**

**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).

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