

# 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" value="Not applicable"/>
Full Name	<input type="text" value="BELINDA BUCKNALL"/>	<del><input type="text"/></del>
Job Title (where relevant)	<input type="text" value="QUEEN'S COUNSEL"/>	
Organisation (where relevant)	<input type="text" value="QUADRANT CHAMBERS"/>	
Address Line 1	<input type="text" value="██████████"/>	
Address Line 2	<input type="text"/>	
Address Line 3	<input type="text"/>	
Postal Town	<input type="text" value="██████████"/>	
Postcode	<input type="text" value="██████████"/>	
Telephone Number	<input type="text" value="██████████"/>	
Email Address	<input type="text" value="██████████"/>	

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 9

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) The Local Plan ignores the Green Belt policy that no development on Green Belt land should take place unless exceptional circumstances exist. There are no exceptional circumstances that require 3,500 houses to be built on Culham Green Belt land.

(2) On the contrary there is no need for these 3,500 houses to be built anywhere in SODC. That is because SODC has grossly inflated the overall number of new houses needed to be provided in the period ending 2034. It has done so by

(a) using the outdated and largely discredited 2014 Strategic Housing Market Assessment to produce its base figure of 14,421 houses.

(b) increasing that base figure to 17,825 without justification.

(c) accepting Oxford's claimed, but wholly unproven, unmet housing need of 15,000 and, notwithstanding that Oxford's own draft Local Plan and SODC's 2017 Local Plan both cited SODC's contribution to that need as 3,750, increasing the figure to 4,950 houses.

By these flawed means it inflates its overall figure for the number of houses needed to 22,775. The number of houses expected to be supplied (as opposed to needed) is even greater. According to Table 5c on page 86 of the Local Plan the net number of new homes to be supplied in the period ending 2034 is expected to be 28,465 with a further 4,025 to be delivered after that date from strategic allocations.

If the number of new homes actually needed is correctly calculated using the Government's Standard Method, based on the Office of National Statistics 2016 figures, and ignoring the need to contribute to Oxford's alleged but unproven unmet housing need, the number of new houses needed is 12,788, making any development on Culham Green Belt unnecessary. It is still unnecessary if the contribution to Oxford's alleged but unproven unmet housing need is taken as 3,750.

(3) There is an alternative location which would obviate the need to build on Culham Green Belt and at least part of the other Green Belt sites in the Local Plan, namely Harrington. This is on green field but not Green Belt, land. It is close to Junction 7 of the M40 and has easy

access to both Oxford and London by private and public transport. It could supply more than half the housing actually needed, and would enable not only the Culham Green Belt but also at least some of the other Green Belt sites to remain as protected land. This site, originally favoured by SODC, and said to be capable of delivering up to 6,500 new homes, is now ignored.

- (4) The Oxford – Cambridge Express Way will open up areas of land for development outside the Oxford Green Belt ring with easy access to, inter alia, Oxford and areas to the south of Oxford via the A34 by public and private transport.
- (5) The Culham Green Belt is particularly unsuitable for development for the following reasons.
  - (a) The site of the proposed development is farmland.
  - (b) The proposed development will be served by the A415. This road is already congested at peak hours. The addition of the transportation associated with 3,500 new houses (private vehicles, service vans, delivery lorries, school coaches, emergency vehicles etc.) will lead to a wholly unacceptable increase in congestion, to the detriment of the public in general but to the users of the emergency services and school coaches in particular. The road is directly adjacent to flood meadows in the Culham Reach and floods from time to time.
  - (c) The proposed site is located on the slope above the Culham Reach of the Thames. If that land is built on it will increase the rate of run off of rain water which at present travels slowly through the ground, with much being taken up by trees, hedges and crops, and small ditches which can flood locally without doing property damage, before it ever gets to the river. The area of the Culham Green Belt site, if developed, will become largely impermeable with surface water piped directly into the river. The effect of climate change is widely predicted to increase the number of storm/heavy rain events. The Culham Reach is already under an increased threat of flooding from the Oxford Relief River which once built will allow the huge volumes of water from the catchment area up river of Oxford to be channelled rapidly around Oxford and back into the Thames down river of Sandford lock instead of percolating slowly around the city as it does presently. No weirs are being planned by the Environment Agency to control the rate of release of this flood water at the Sandford lock end of the relief river. Its plans to create flood storage to reduce flood risks in the Abingdon area have recently been abandoned as too expensive. The next lock downstream of Sandford lock is at Abingdon. Swift Ditch divides from the main navigation channel upstream of Abingdon lock and thus by-passes Abingdon lock and its weirs. It thus carries a large volume of water at times of high water flow, including the increased burden once the Oxford relief river is built, and will deposit that water back into the main channel in the Culham Reach, at its outlet opposite Abingdon Marina. Culham village and Abingdon Marina are thus already facing increased risks of flooding. No development should be permitted that further increases that risk.

(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? \*

(Continue on page 4 if necessary)

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:

15<sup>TH</sup> 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 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.**

**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).