

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	Mrs
Full name	Sue Cooper
Business / Organisation name (if relevant)	-
Job title (if relevant)	-
Address line 1	[REDACTED]
Address line 2	[REDACTED]
Address line 3	-
Postal town	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]
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: Chapter 4 and the STRAT policies

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.

I have many concerns about chapter 4 and most of the STRAT policies.

STRAT1 Please remove or edit 2nd bullet point. There are far too many sites. It doesn't take account of STRAT5 with its increased densities which should imply that either fewer sites are needed or the sites can be smaller or a combination of these. But there is no evidence of this.

STRAT2 The numbers of houses are too big and based on out of date data.

The committed components of housing supply numbering 15,726 (= completions April 2011 – March 2018 plus commitments as at 30 September 2018 of 11,362) well exceeds the standard method as per NPPF. So there is an argument for saying that none of the strategic sites listed in STRAT1 are needed.

The SHMA figures used are now more than 5 years old and so probably out of date. Indeed the figures derived from the updated SHMA commissioned by Oxford City for their Local Plan are considerably lower than those being used in SODC's Local Plan for Oxford's unmet need. At the very least, inclusion of sites in the Green Belt around Oxford should be conditional upon having up to date figures for Oxford's unmet need.

STRAT6 Green Belt - Where is point 2?

Point 3 should either be removed altogether or at least edited to remove references to STRAT12, STRAT13 & STRAT14 (dependent upon having up to date figures for Oxford's unmet need.

It is interesting to note that " amendments to the Green Belt made by the Wheatley Neighbourhood Development Plan must be in compliance with the requirements of the NPPF". Why shouldn't the amendments to the Green Belt advocated in the SODC Local Plan also comply with the NPPF? Very scant justification is provided for the removal of so many large areas from the Green Belt. I think it is very dangerous to advocate such major alterations to the Green Belt here with such poor evidence of need.

I suggest adding another point advocating providing new green belt land to compensate if any is removed.

Remove STRAT7. Land at Chalgrove Airfield is Non-deliverable. Martin Baker don't want to go and will resist compulsory purchase. At the very least this causes a timing issue and it is quite likely that it won't happen. SODC shouldn't displace a good exporting firm. Shouldn't we keep some airfields in southern England?

Chalgrove is a very unsustainable location. There are no railways, no cycle routes and very poor roads (apart from the one which it is proposed to remove as it passes through the proposed site!) When the NPPF urges taking note of climate change it does not make sense to build a new town without a railway. Maybe the site could be connected to the rail system by a new route joining the track at Chinnor and from there to Princes Risborough and hence to London?

The site is visible from AONB. (We need to protect setting of AONB – development will be contrary to NPPF 170a,172?)

STRAT9 Culham - Modify. It is sensible to have housing near these important employment sites & a railway station but the area to be removed from the Green Belt is much too big. Maybe leave out land north of Thame Lane? Certainly all land bordering the Thames should be left in the Green Belt.

STRAT10 Berinsfield. We have been lead to believe that the residents of Berinsfield are happy with the extra development providing they get a number of other benefits. But the area identified with STRAT10 should be modified.

Leave out land in the parish of Drayton St Leonard (unless they are happy with it being removed from the Green Belt in which case it probably makes sense to alter the parish boundary)

Add in an extra strip of land around the north west to accommodate a road (and a strip of development to pay for it!) joining the new site to the A4074.

Boundaries with the Green Belt should be discernible physical features as per the NPPF (not just field boundaries)

STRAT10 Grenoble Road if it is retained must have a condition requiring passenger services on the Cowley rail line. It is a large site and with the densities specified in STRAT5 should have room for more homes than stated if Oxford's needs demand it.

STRAT12 & STRAT13 Remove. Not needed for housing. Protection of Green Belt very important here. STRAT13 particularly bad from flooding & ecological points of view. Sites not particularly well connected to Oxford City because of need to cross the ring road. And I am sure you will receive many more detailed reasons from local residents as to why these areas should not be developed.

In STRAT14 it is not necessary to remove the site from Green Belt. Oxford Brookes site can be redeveloped as brownfield land without its removal. No convincing reasons are given for removal. Safer to leave it in! The second bullet point should be edited to leave out "Wheatley, Northfield, Chalgrove and North of Bayswater Brook"

According to the figures provided in Strat2 (which are questionable anyway) these sites should not be needed.

The Chalgrove site is of very doubtful deliverability.

A strong case has not been established for removing Wheatley, Northfield and North of Bayswater Brook from the Green Belt and hence their proposed removal is contrary to NPPF paragraph 136.

I have left Grenoble Road in in case it is needed to meet unmet need of Oxford City.

I have said that I don't know whether the plan has complied with the duty to co-operate as we do not really know how many homes are needed by Oxford City and won't until either up to date figures are provided (SHMA figures are 5 years old and of doubtful reliability) or the Inspector looking at the Oxford City Local Plan has given his judgement.

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.

STRAT1 Please remove or edit 2nd bullet point. The second bullet point should be edited at least to leave out "Wheatley, Northfield, Chalgrove and North of Bayswater Brook"

STRAT2 needs updating with up to date figures to include revised Oxford City requirements. The text should make more reference to the Standard method and figures for this (2014 v 2016 or possibly an update on these) since we should be working within the new NPPF. Also, reference should be made to the number of completions since 2011 (as up to date as possible) and numbers "in the pipeline", agreed in outline or in principle.

STRAT6 Green Belt - Where is point 2?

Point 3 should either be removed altogether or at least edited to remove references to STRAT12, STRAT13 & STRAT14 (dependent upon having up to date figures for Oxford's unmet need. And SODC needs to note its own suggested policy when proposing excessive amounts of land to be removed from the Green Belt. Also, according to the the NPPF boundaries with the Green Belt should be discernible physical features (not just field boundaries)

Remove STRAT7. Land at Chalgrove Airfield is Non-deliverable.

STRAT9 Culham - Modify. The area to be removed from the Green Belt is much too big. Maybe leave out land north of Thame Lane? Certainly all land bordering the Thames should be left in the Green Belt.

STRAT10 re Berinsfield should be modified.

Leave out land in the parish of Drayton St Leonard. Add in an extra strip of land around the north west to accommodate a road (and a strip of development to pay for it!) joining the new site to the A4074.

STRAT11 Grenoble Road if it is retained must have a condition requiring passenger services on the Cowley rail line.

STRAT12 & STRAT13 Remove. Not needed for housing if recommended densities are used on other sites. Protection of Green Belt very important here.

STRAT14 Oxford Brookes site Remove point 5 as it is not necessary to remove the site from Green Belt.

Q9. Please upload any supporting documents below:

- File: LocalPlanObjections.docx - [Download](#)

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?

No

Page 106: Future contact preferences

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