

# 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	Mrs	
Full Name	Helen	
Job Title (where relevant)	Marshall	
Organisation (where relevant)	CPRE OXFORDSHIRE	
Address Line 1	20 High Street	
Address Line 2		
Address Line 3		
Postal Town	Watlington	
Postcode	OX49 5AF	
Telephone Number	01491 612079	
Email Address	campaign@cprexon.org.uk	

## 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:

**Section 4, Spatial Strategy p. 25 et seq. and Policy STRAT 1**

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.

**The Spatial Strategy is not, as claimed, an evolution of the current adopted Plan, nor is it either appropriate or achievable.**

The Spatial Strategy at 4.8 states that it “draws together” the Core Strategy approach with development at Science Vale and “next to the major urban area of Oxford”.

This was not in fact the Core Strategy Policy. On the contrary, whilst focussing on Didcot/Science Vale, the Core Strategy included no allocations “next to the major urban area of Oxford” but instead concentrated other development on the market towns of Henley, Thame and Wallingford which had been the long-term Structure Plan policy of directing development to County Towns and away from Oxford. This was a strategy which CPRE endorsed as it protected the historic setting of the City, protected the Green Belt and acknowledged that the medieval layout of Oxford, and its rivers and flood plains made it unsuitable as a development hub.

The new Plan is therefore not in any sense “drawing together” the Core Strategy approach but in fact proceeding in an entirely new direction, a direction which at the time of the Core Strategy and previously had been dismissed.

Not only is 4.8 misleading, as the Strategy it describes is not an evolution of a longstanding position but an entirely new direction, but the Strategy itself is misconceived. Whilst the concentration on the Science Vale is supported, the Strategy of directing development to Green Belt sites particularly on the urban fringe of Oxford is unjustified and unacceptable as are the excessive housing and employment numbers in the Plan which will do more to create environmental and social problems than resolve them, as well as placing undue strain on infrastructure including roads and education.

The scale and location of new development is inappropriate, and also likely to be unachievable and undeliverable.

It is unlikely that the rate of development implicit in the Plan could be achieved either in terms of builders' capacity to build the houses, or create the appropriate infrastructure, or the landscape's capacity to absorb the houses, or communities' capacity to absorb the "incomers" implicit in the Plan.

This will lead to both a failure to meet the Plan totals and – especially in the later stages – three/five year housing supply, but also to developers cherry picking the most sensitive of the allocations particularly around Oxford for the most likely consumer base of London commuters.

This in turn will lead to settlements full of absentees contributing little to the local economy or to social cohesion and real locals priced out of housing by the spending power of more affluent commuters.

(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.

The Plan is fundamentally unsound and should be re-drafted based on the appropriately assessed needs of local residents.

Any additional growth should be modest in scale; at a rate which can be absorbed without harm to the rural nature of the District, or to the cohesion of its society; in sustainable locations outside the Green Belt and AONB; and deliverable.

(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: 15.2.19  
*(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.**

**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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