

# 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="Mrs"/>	<input type="text"/>
Full Name	<input type="text" value="Helen"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Marshall"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="CPRE OXFORDSHIRE"/>	<input type="text"/>
Address Line 1	<input type="text" value="20 High Street"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text" value="Watlington"/>	<input type="text"/>
Postcode	<input type="text" value="OX49 5AF"/>	<input type="text"/>
Telephone Number	<input type="text" value="01491 612079"/>	<input type="text"/>
Email Address	<input type="text" value="campaign@cpreoxon.org.uk"/>	<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 11 – GRENOBLE ROAD

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.

### SEE ALSO OUR RESPONSE TO STRAT 6 GREEN BELT

#### Oxford's Unmet Need Group of Sites.

The three sites on the inner edge of the Green Belt – Grenoble Road, Northfield and Bayswater Brook - are all considered to be justified on the “exceptional circumstance” of assisting in meeting Oxford’s unmet need albeit secondary justifications related to Park and Ride and potential rail link are cited. These would not have the capacity to be exceptional circumstances as whether they proceed or not is not mainly or even largely related to the proposed developments.

All the sites include a considerable portion of “green infrastructure” in some cases up to two thirds of the site area, as at Northfield. It is perverse to release land from the Green Belt to provide green infrastructure, which can in any case hardly be an exceptional circumstance and any releases which may be approved should be reduced to the area intended to be built. If the “green infrastructure” is intended to mask future extension in the next plan period then it should be made clear that this is the case.

#### 1. No unmet need exists.

Whilst the new NPPF does not carry forward Ministerial advice that unmet need will not usually be a justification for Green Belt release, at para 60 it does require that “need” should be measured by the standard method, that is the new OAN formula or an equivalent based on population projections and “market signals”.

On that basis the 15,000 house Oxford unmet need, based on the out of date SHMA (the “working assumption” on which all Oxon Local Plans are based in default of any clear working by Oxford

itself) would be reduced to just 1,920 houses or pro rata 634 for South Oxfordshire, as against the 4,950 based on the SHMA.

The urban edge Green Belt sites presently in the Local Plan amount to 4,600 homes, 4,000 more than the standard method.

That however assumes that Oxford's housing capacity is limited to the 13,000 houses from which the 15,000 unmet need working assumption based on the out of date SHMA was derived.

As CPRE has shown (see STRAT 5 response), merely using the densities SODC proposes for the urban edge sites for the new build in the City could increase Oxford's capacity by 8,000 houses, without affecting the ring-fenced employment land. Allocating the latter to much-needed housing, instead of retaining it to ratchet up housing demand rather than satisfy it, would remove the SHMA "working assumption" of unmet need altogether.

Since all of the SHMA houses could be accommodated in the City and even assuming the City's low density and ring-fenced employment land were acceptable, the City could accommodate all of its housing need under the OAN, no unmet need exists.

There is therefore no unmet need to be satisfied and satisfying it cannot be an exceptional circumstance for Green Belt release.

**2. In any case urban edge development is not necessary to satisfy unmet need, even should any exist.**

In considering the allocation of Oxford's "unmet need", in a very flawed process the Growth Board commissioned reports from Landscape Use Consultants to assess the suitability of sites offered by the Districts themselves. On that basis the quantum of unmet need per District was calculated.

It is significant that LUC did not include proximity to Oxford in their assessment but accessibility, a very different measure.

On that basis they assessed a site distant from Oxford at Drayton St Leonard equally with sites immediately on the urban edge like Kidlington.

In the Vale Enquiry Part 1 the Inspector accepted that a site on the North of Abingdon was capable of providing for Oxford's unmet need although the territory of the Vale stretches up to Oxford and indeed includes part of the City at Botley. In their Local Plan West Oxfordshire provide for the greater part of the Oxford unmet need at Eynsham, eight miles from the City and outside the Green Belt. Neither did South Oxfordshire District Council in its previous aborted submission Plan in October 2017 include any of these sites to provide for Oxford's unmet need, which was accommodated elsewhere.

All this goes to demonstrate that neither the Growth Board nor either of the Local Authorities who have had their plans tested to date, nor up to October 2017 South Oxfordshire itself, considered it essential that accommodating Oxford's unmet need necessitated an urban edge or even a Green Belt location.

Neither Oxford's unmet need nor an urban edge location are therefore exceptional circumstances to over-ride the presumption of protecting the Green Belt for releasing the sites in the "unmet need" group at Northfield, Grenoble Road or Bayswater Brook.

(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.

This allocation and proposed alterations to the Green Belt are unjustified and should be entirely removed from the Plan.

(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:

(this can be electronic)

Date:

15.2.19

### 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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