

# 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="R Crockett"/>	<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"/>	<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"/>	<input type="text"/>
Email Address	<input type="text" value="████████████████████"/>	<input type="text"/>

## 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 relate.

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:

ENV5, ENV6 & TRANS5

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.

ENV5 – Green Infrastructure in New Developments

ENV6 – Historic Environment

TRANS5 – Consideration of development proposals

ENV5 - Para 8.27 states that Green Infrastructure is “capable of delivering a wide range of environmental and quality of life benefits for local communities”.

This policy omits to recognise that the public rights of way networks play a very important part in delivering environment and quality of life benefits and this policy fails to ensure the protection of nor enhancement of Public Rights of Way (PROW). PROWs are very important in linking new developments to the surrounding countryside. This fails to comply with NPPF para 91, 98 & 20, and does not follow Planning Practice Guidance for Open space, sports and recreation facilities, public rights of way and local green space. Saved Policy R8 in the current local plan 2011 – recognised the importance of rights of way “not only as pedestrian routes, but because they provide opportunities for people to enjoy quiet, open countryside.”

ENV6 – “1. The Council will seek to protect, conserve & enhance the District’s historic environment. This includes all heritage assets including historic buildings and structures, Conservation Areas, landscapes and archaeology.

2. Proposals for new development should be sensitively designed and should not cause harm to the historic environment. .... “

Many public rights of way are of historic and heritage value e.g. Icknield Way, The Ridgeway, Chiltern Way and routes of local historical interest (e.g. former forestry tracks, drovers’ routes, pack-horse trails etc). This policy omits to make any reference to or recognition of these assets & therefore fails to comply with NPPF paragraphs 8c, 20c, 185 & 185.

TRANS5 – Consideration of development proposals. This policy omits to protect any public rights of way that may exist on a site and does not mention safe routes for horse riders which are important as developments expand over green field sites and road traffic increases. Point ii) talks about linking to public rights of way, but care must be taken so that the creating of cycle routes within a development don't join up to public footpaths without the upgrade of the public footpath to a restricted -way or bridleway, and the funding for this provided by the developer.

(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.

Between CF1, ENV5 & ENV6 I would like to see the historic and landscape importance & protection of the current rights of way recognised, and as per saved local plan 2011 policy R8 – The retention and protection of the existing public rights-of-way network will be sought and where appropriate proposals to improve it will be sought. I would like to see a policy similar to Vale of White Horse Local Plan Part 2 <sup>1</sup> section 3 – Building Healthy & Sustainable Communities which recognises the importance of Public Rights of Way, National Trails and designated Open Access Areas, and includes a specific policy Development Policy 31 which states

“Development on and / or over public rights of way will be permitted where the development can be designed to accommodate satisfactorily the existing route, or where the right of way is incorporated into the development site as an attractive, safe and continuous route. Alternative routes will need to be made equally or more attractive, safe and convenient to rights of way users. The Council will actively seek opportunities to improve the accessibility and the addition of new connections and status upgrades to the existing rights of way network, including National Trails. Proposals of this nature will be supported where they would not lead to increased pressure on sensitive sites, such as those of important ecological value. Development will not be permitted where proposals remove, narrow or materially impair the approved line of the Thames Path or Ridgeway National Trails, key connecting routes, and / or public access to them) to ensure their protection.

Suggested wording below should also be included:

“The Council will continue to retain, protect and enhance the existing Rights of Way network. Where appropriate, proposals to improve it will be supported.

New development should not undermine the routes and their existing amenity, recreational, historic and landscape value.

Specifically, development will not be permitted where proposals remove, narrow or materially impair the approved line of the Thames Path, Oxford Green Belt Way, Ridgeway National Trail (incl. Icknield Way) or Oxfordshire Way, or key connecting routes, and / or public access to them.”

TRANS5 – should look at where possible upgrading of routes from footpaths to restricted byway or even bridleway to allow as many users as possible to link between public rights of way to keep them safe.

I suggest the wording below:

Point ii) provide safe and convenient routes for cyclists and pedestrians **by the retention & protection of public rights of way**, within the development, and by providing safe links to rights of way for all users to other off-site walk, cycle routes and bridleways where relevant.

Saved local plan policy R8 5.99 states “The council will ensure that new developments, for example housing or employment are adequately linked into the existing rights-of-way network.” This should be included somewhere within the plan. It may be more appropriate for this to be included in ENV5 or CF1.

(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 Feb 2019  
(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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