

# 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:

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 overall strategy is based up flawed numbers to meet a level of housing delivery agreed by the growth board to support a government ambition of house building based on a number with no supporting evidence (National Audit Office Report Planning for New Homes - Strategic planning for New Homes point “6 The Department has an ambition to support the delivery of 300,000 new homes per year from the mid-2020s, which will be challenging to meet. The Department’s ambition was announced in the 2017 budget, but with no detailed calculations supporting it)<sup>1</sup>.”

This has resulted in use of outdated SHMA calculations, to support development within the Green Belt to provide housing need for Oxford City even when the council (on page 34 of this plan) recognises that there is “significant uncertainty regarding the precise level of unmet need which Oxford City may find on the conclusion and adoption of their own plan”. All of the Strategic Development sites proposed and much of the remaining development proposed will cause so much damage to the environment, countryside and current residents of the district that the amount of infrastructure required to mitigate against the impacts of these developments is huge. Funding for these infrastructure requirements via the Growth Board, and government is insufficient to cover the total costs, so it is the developers that are expected to meet the difference. It is unlikely that the developers will come up with enough funding to deliver the required infrastructure as the National Audit Office Report – Planning for New Homes<sup>2</sup> says,

Providing infrastructure to support new homes

16 The way infrastructure is funded is complex, involves several government departments and private developers and lacks cohesion and certainty.

18 The system to get contributions from developers towards the cost of infrastructure is not working effectively.

<sup>1</sup> <https://www.nao.org.uk/wp-content/uploads/2019/02/Planning-for-new-homes.pdf>

<sup>2</sup> <https://www.nao.org.uk/wp-content/uploads/2019/02/Planning-for-new-homes.pdf>

## 19 Developers can use the planning system to pay less in contributions than agreed

It is clear from looking at the Infrastructure Delivery Plan that there remain big gaps in funding and it is unlikely that the infrastructure required to support the development proposals within this plan will be delivered. If one site such as cannot be delivered or fails to reach the trigger point for contributions it would leave a shortfall in funding towards shared mitigation projects such as Culham Bridge. Many communities without the facilities they require, with some settlements getting the schools, bypasses plus other infrastructure they require, whilst others don't.

Many of the housing developments require the allocation and purchase of land to provide bypasses. It can take along time for planning permission for such roads to be given, and indeed the compulsory purchase of land may be required. This plan has failed to identify and secure much of the land needed to provide the required infrastructure, which threatens the plan's ability to meet its delivery targets and will lead the district to continued developer-led development.

This Strategy is contrary to policy ENV2, ENV12 & EP1.

Air quality conditions are already worsening – as shown in the Sustainability Appraisal Addendum 2019<sup>31</sup> recognises that “Council’s Air Quality Annual Status Report (ASR) notes that exceedances of the annual mean concentration objective (40 µg NO<sub>2</sub>/m<sup>3</sup>) have been recorded during 2017 in all three declared AQMAs (Wallingford & Henley-on-Thames are two of these) and also in other areas of the district in 10 occasions, 3 more than last year.” These other areas included “Thame, Chinnor and areas near the M40” which “have suffered significant increases in NO<sub>2</sub> levels, suggesting the potential need for new AQMAs in the district.” To continue supporting a level of development as set-out in this plan will result in pollution contrary to European and Government regulation. Indeed the Oxfordshire Clinical Commissioning Group Locality Place Based Primary Care Plan: South East Oxfordshire Locality – Jan 2018<sup>4</sup> states

“The SE locality has lower than CCG average prevalence for diabetes, but **higher prevalence of Asthma**, atrial fibrillation (AF), hypertension and **COPD** as per QOF data 2016-17<sup>6</sup>. The variance in AF and hypertension is likely explained by the older population; **asthma and COPD is possibly down to air quality variance.**”

The level of development proposed in this plan will only make the air quality situation worse and it should be noted that the OCCG report will not include the health of the population of Chinnor, and some of Thame as their primary care provider is Buckinghamshire CCG. The deterioration of air quality will not only effect humans and wildlife, but the poor air quality will damage the Chilterns Beechwoods Special Areas of Conservation near to the M40. What also must be considered is that with new housing in the age of internet shopping, will come more van deliveries – more-often-than-not in diesel fuelled vehicles. A report published by the RAC Foundation dated May 2017 looking at The Implications of Internet Shopping Growth on the Van Fleet and Traffic Activity<sup>5</sup> found that total van traffic is a significant contributor to congestion and air pollution (and 96% of light commercial vehicles are diesel-powered), and the daily operating cycles of vans conflict heavily with the morning commute.

(Continue on page 4 if necessary)

<sup>3</sup> <http://www.southoxon.gov.uk/sites/default/files/Sustainability%20Appraisal%20-%20Addendum.pdf>

<sup>44</sup> <https://www.oxfordshireccg.nhs.uk/documents/work%20programmes/south-east-oxfordshire-locality-plan.pdf>

<sup>5</sup> <https://www.racfoundation.org/research/mobility/the-implications-of-internet-shopping-growth-on-the-van-fleet-and-traffic>

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.

Funding for all infrastructure requirements (especially those that rely on delivery of many sites), and the land required for the bypasses, must be allocated and in place before any development starts. If this cannot be secured the site/s must not be developed.


(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 Feb 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).

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