

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

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"/>

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 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 6 Green Belt

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.

This is against Government policy and protection of the Green Belt. Release of Green Belt sites is contrary to STRAT1 ix) Protecting & enhancing the countryside and particularly those areas within the two AONBs and the Oxford Green Belt.....

There are no exceptional circumstances. Page 34 even 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.

CPRE Oxfordshire clearly sets out why this policy is unsound and contrary to government policy:

“The purposes of the Green Belt are: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Green Belt is a planning mechanism and does not depend on the attractiveness or otherwise of its constituent landscape. All Green Belt land contributes to assisting in urban regeneration; and assisting in safeguarding the countryside from encroachment. The Oxford Green Belt is not very deep and all of it protects from unrestricted sprawl, if not as a line of first defence in every case. On the outer edge, notably at Culham, it is preventing merger of neighbouring towns, being Oxford and Abingdon. The setting of Oxford is not just important views, but the whole physical approach to the City which will be harmed by loss of Green Belt land. In the NPPF, para 136 requires that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified 3 Para 137 requires that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for

development. Para 138 requires that strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. It is our case that no exceptional circumstances exist for any of the proposed Green Belt releases; that the para 137 sequential process has not been evidenced and that consequently the point at which exceptional circumstances could be considered has not been reached; and that no consideration has been given to channelling development to areas inside the Green Belt boundary or beyond it as required by the NPPF. The background Site Selection paper, recognising the requirements of the NPPF states merely at Part 2 page 7 that Excluding Green Belt sites from the potential allocations would lead to a shortfall of 3,356 homes against the housing requirements. It is considered that to deliver the required number of homes, the release of sites from the Green Belt is required. Secondly, there are significantly more sustainable options for strategic allocations that are available and deliverable on sites, currently within the Green Belt. It is clear that the Green Belt sites in general are being considered pari passu with others, the Green Belt is being treated as the location they happen to be at rather than as a designation representing a high hurdle for release. The fact of the Green Belt location is not treated as a strong factor against development despite e.g. para 133 of the NPPF stressing their intended permanence, and the sequential process in 137 clearly requiring all alternatives to be dismissed before even the consideration of exceptional circumstances can begin. The NPPF at 137 requires Authorities to consider whether consideration of Green Belt development could be avoided by: 1. Optimising the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and 2. discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. 3. And 138 recommends channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

(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.

All sites (other than Berinsfield) that cannot be redeveloped (as permitted under Green Belt rules) should be removed from the plan.

All green infrastructure & undeveloped sites to be washed over by Green Belt policies to deter from future development and to recognise their importance in meeting the need to protect the setting of Oxford.

(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

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 or call 01235 422600 (Text phone users add 18001 before you dial).

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