

South Oxfordshire Local Plan 2034

Page 3: Part A - contact details

Q1. Are you responding as an:

Individual

Page 4: Individual contact details

Q2. Due to the plan-making process including an independent examination, a name and means of contact is required for your comments to be considered:

Title	Mr
Full name	Oliver de Soissons
Business / Organisation name (if relevant)	-
Job title (if relevant)	-
Address line 1	████████████████████
Address line 2	██████
Address line 3	-
Postal town	██████
Postcode	██████
Telephone number	-
Email address	████████████████████

Page 7: Part B - your comments

Q5. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. 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 13

Q6. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?		X		
are sound?		X		
comply with the Duty to Co-operate?		X		

Q7. 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.

With reference to Biodiversity: 1 The evidence presented to SODC shows that it is highly likely there will be a nationally significant impact on biodiversity and cultural value if Strat 13 stays in the Local Plan, including wildlife's ability to adapt to climate change.

2. Before deciding on policy Strat 13 SODC have not followed the evidence in the background paper and have not carried out the proper hierarchy of decision-making

Policy Strat 13 is not effective because:

- It is uncertain and highly unlikely to meet National and other Local Plan policies and objectives.
- SODC is not following the NPPF requirement that the Plan needs to be evidence led, and applied the Precautionary Principle established in international treaties. SODC has not shown that it has enough evidence that significant damage will not occur or can be mitigated or compensated.
- Strat 13 allocation of the site for Housing has a high risk of not being delivered because of biodiversity impact
- The new Green Belt Boundary in Strat 13 makes it possible for highly damaging housing to be built right next to the wildlife reserve, contrary to other policies in the Local Plan. The proposed new boundary of the Green Belt releases land adjacent to the SSSI for development

With reference to Landscape impact, it is obvious from your own landscape study that the western (Lower Elsfield) site is of high landscape value at a District wide level and should not be consider for Housing.

Q8. 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.

Strat 13 needs to be removed from the Local Plan completely

If it is kept in the Local Plan, the land not built-up should be kept in the Green Belt to stop planning applications adjacent to theSSSI

Q9. Please upload any supporting documents below:

- File: Strat13representationLocalPlan2034deSoissons.docx - [Download](#)

Q10. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q11. Would you like to comment on another policy or paragraph?

Yes

Q12. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. 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: The Local Plan as a whole

Q13. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?		X		
are sound?		X		
comply with the Duty to Co-operate?		X		

Q14. 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 Local Plan 2034 is not ready for Submission: the Local Plan is full of policies that lack implementation details (for example incomplete Infrastructure Delivery Plan) and leaves strategic issues to the Planning Application Stage (including Air Pollution and Human Health Assessments) making it incomplete.

The Local Plan 2034 Submission version is not legal: a/The policies have been refined and chosen as preferred options in the Local Plan 2034 after the Regulation 18 consultation in 2017, and most of the evidence documents have been written after the 2017 consultation, many since September 2018, and thus local residents have not had the opportunity to participate in their genesis as required by law.

b/Sustainability Appraisal actually concluded that the Spatial Strategy has uncertain as well as significant negative impact, enough to make the Local Plan unsound in reference to Sustainable Development

Q15. 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 Local Plan should be withdrawn, changed so there is a complete Infrastructure Delivery Plan, have the 'requirements' in the Policies removed if there is insufficient evidence they are possible, and then subject to Regulation 18 (eighteen) consultation so local residents can participate in their development as required by law

Q17. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q18. Would you like to comment on another policy or paragraph?

No

Page 106: Future contact preferences

Q354. 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) below:

I would like to be added to the database to receive planning policy updates for South Oxfordshire