

## SODC Local Plan 2011-2034.

### Overall Strategy STRAT1, STRAT 2 and STRAT 5

South Oxfordshire's Stated Housing Need.

The Parish Council considers the Plan to be unsound for the following reasons:

As in the former version of the Local Plan, the new Plan again presents SODC's housing need as a given; there is no presentation of the national government's, or SODC's assumptions used to calculate housing need. Moreover, the Plan states that an additional housing need is imposed by the Housing and Employment Requirements of STRAT 2 (P35, *addressing SODC's need to contribute to the Growth Deal*). There is no means of verifying the actual need under this heading, other than the need to generate income from sale of houses.

If the Plan is implemented, South Oxfordshire will therefore suffer total change in its rural character, in exchange for a stated overall housing need that is not verifiable. This is unsound.

### Modifications

A reasoned calculation of actual housing need should be presented.

Development proposals should be made in response to sound projections of demand.

STRAT 5 recognises the need for increased residential densities where practical and applicable. **This strategy is to be applauded**, and must be robustly applied in order to reduce the amount of land given over to more housing on the Green Belt.

### Green Belt STRAT 6 (P43).

The Parish Council considers Strat 6 unsound. It is not consistent with national policy, and is **not justified**. A policy which destroys large tracts of Green Belt would promote ease of building for developers, but is **not sustainable**.

The Plan calls for large developments on seven Green Belt sites. Such a policy is totally inconsistent with the Plan's stated aim of "protecting the Green Belt from harmful development" and totally inconsistent with national planning requirements, which call for development only in "exceptional circumstances". No such circumstances are clearly set forward in the Plan.

In particular, the Plan's proposals for Culham (STRAT 8/9) and Berinsfield do not offer exceptional circumstances or need, to justify the removal of such large tracts of land from the Green Belt; moreover, the proposal for the Culham site would, in essence, take the Abingdon conurbation across the R. Thames into attractive, wooded countryside. Such development is not sustainable.

### Berinsfield (STRAT 10)

Development here on the scale proposed (1700 new dwellings) is unsound and unjustified, on the following grounds:

#### 1. Removal from the Green Belt.

See above.

## 2. Potential merging of the two villages of Berinsfield and Drayton St Leonard.

The need for "green infrastructure" on inset land is not defined. The area (Map, Appendix 4 p. 261) inset from the Green Belt crosses over the parish boundary, and covers a large tract of agricultural land in Drayton St Leonard parish.

## 3. Removal of a large area of land for unspecified use

This intrusion of the Berinsfield allocation into Drayton village is **unjustified**. Residents can only assume that area has been set aside for unspecified further development, as no specific need is given in the Plan. This approach is therefore **unsound**.

## 4. Destruction of precious open landscape between settlements and beyond.

This development runs contrary to Plan Policy ENV 1: (Landscape and Countryside) and the Plan's stated aim to "*maintain sustainable agricultural land and practices and (to preserve) the district's rural character and landscape*" (p167, Natural and Historic Environment)

## 5. Transport and traffic.

1700 additional houses at Berinsfield will place intolerable strain on the existing lane between Berinsfield and Drayton St Leonard, an unclassified road, with no pavements in the village, which is already used as a rat run between large population centres. Neither the Strategic Allocation maps of Appendix 2 (p 254 on the Plan) nor the Safeguarding maps of Appendix 5 (p264 on the Plan) show clear intention to provide a new road with the capacity to take traffic between Berinsfield and a nearby highway, e.g North to the A4074. Building on such a scale in Berinsfield is therefore **unsound**, without indication of how road infrastructure and local transport subsidies will be designed to take through traffic away from Drayton St Leonard village.

## 6. Minerals and Waste

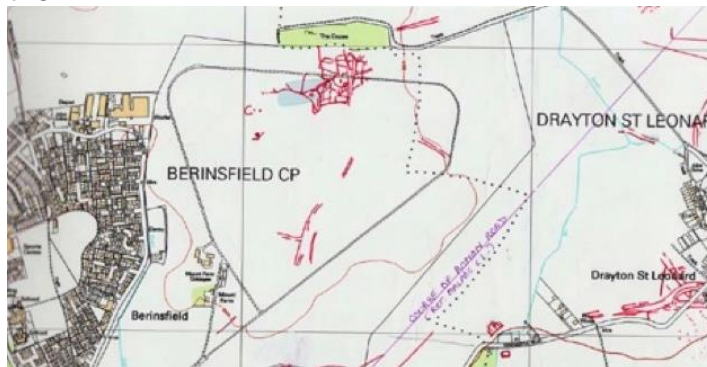
### STRAT 10

There is no presentation, in the Local Plan, of minerals site nominations as put forward by Oxfordshire District Council. OCC's site SG09 conflicts with both the Green Belt and the housing allocation for Berinsfield. (maps of mineral site SG09 together with neighbouring minerals site nominations are presented in Oxfordshire's latest Minerals and Waste Local Plan). **OCC has recently given SG09 minerals allocation a raised priority for minerals provision.** SODC's own large scale map (SHELAA Published Jan 2019), shows a clear conflict between projected housing development sites, their underlying Green Belt in-setting, and minerals site allocations; this conflict is not covered in the Plan.

It is probable that OCC's need for minerals strategic sites will have higher priority than SODC's large-scale proposal for housing at this specific site. Conflicting requirements for land at Berinsfield therefore make that proposal **unsound**.

7. Environment, Archaeology and Heritage Policies ENV 9 and ENV10 (P184 *et seq*) and paras. 8.37 and 8.38 (P185) state a need to protect archaeology, historic battlefields etc. citing their heritage value and value to the community.

The area of Green Belt inset for development overlies a nationally important, complex, multi-period archaeological site. Cropmark indications are shown on the OS map below, plus the route of the Roman road that crosses the site to the NE:



ENV 10 recognises the need to preserve historic battlefields. The crucial role of Mount Farm airfield in WW2 photo-reconnaissance is well understood, and the airfield deserves preservation. This is recognised by the Airfield Preservation Trust, see <http://www.abct.org.uk/airfields/airfield-finder/mount-farm/>

#### **Modifications:**

A doubling of the size of the village cannot be justified on Green Belt grounds; The Green Belt could be "inset" to accommodate a smaller development in line with the need of village residents. The Plan must make clear it's justification of housing need; it is therefore unsound, as it stands.

SODC must work with OCC to create, and state a clear strategy for road infrastructure and transport needs, **if large, essentially isolated developments are proposed within a rural setting**. Such a strategy should also recognise, and quantitate the additional Green Belt land required for roads. The Plan is, otherwise, unsound.

Assign priorities between minerals exploitation, estimates of housing need and heritage assets. The Plan should state what care will be taken of archaeological and heritage assets. Without a clearly stated policy in respect of these, for specific sites, the Plan creates ongoing uncertainty and concerns, and is unsound.

#### **The Proposed "Ox-Cam" Expressway.**

TRANS 1: Very briefly touched on in the Plan, this adds an additional, huge level of uncertainty. Its terms of reference include massive added development (100,000 houses and 10-mile motorway) and other infrastructure. South Oxfordshire is the likely target and its rural character will be destroyed if such projects are put in place. Without recognition of the huge impact of the Expressway, and how to deal with it, the Plan is unsound. Modification.

Give a clear indication of how SODC intends to respond to the conflicts imposed by expressway proposal.

**Charles Dickerson.**