

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="Dr"/>	<input type="text"/>
Full Name	<input type="text" value="Bruce Alan Charles Don"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Management Consultant (retired)"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="N/A"/>	<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" value="██████████"/>	<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 relates.

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:

South Oxfordshire District Council Local Plan 2034

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.

My overwhelming concern is about the **soundness** of the plan, in that the scale of the proposals in this plan will radically transform the character of the countryside and villages in the north of South Oxfordshire forever, yet it does not seem to be based on a robust and transparent understanding of housing need, it contravenes national guidelines and has been poorly explained and consulted upon.

Specific points are made on Page 4.

(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.

Further analysis of housing need, with greater transparency regarding growth assumptions

No development on the green belt contiguous with Oxford city –i.e. south of Grenoble Road

Alignment of assumptions and plans with the, as yet unknown, impacts of the Oxford-Cambridge Expressway

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

Fuller consultation with affected local residents and impact analysis on local Neighbourhood Plans, where these exists (as is the case for The Baldons)

(Continue on page 4 if necessary)

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: 18/02/2019

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

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.**

My points in relation to the question above as to “why you do or do not consider the Local Plan to be sound”:

- The huge number of houses proposed for this area is out of all proportion for what exists now and what growth has gone on in the past decades. It is not clear what growth assumptions lie behind the figures for housing need, and I understand there is contention between the housing need that the Government forecasts suggest and what the Oxfordshire Growth Board suggest. Until there is full **transparency and independent testing of the underlying growth assumptions**, approval of this plan seems premature.
- Until recently, SODC was opposed to any building on the green belt in the area south of Grenoble Road, and I was in agreement with this policy. However, sometime in 2018 this policy changed and now SODC supports such developments. Previous consultations on the Plan, including the previous publicity period in October 2017, occurred before the decision to build on the green belt in the area. I don't recall having been consulted on this radical U-turn, therefore I don't believe the Plan is consistent with SODC's **“Statement of Community Involvement”**.
- By definition, the SODC proposal to build extensively on the **green belt** to the south of Oxford City contravenes NPPF guidance which states that, ‘the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open’. I can see no convincing justification to claim there is “exceptional need” (see above re justification of need) to build on the green belt.
- Our villages (Marsh Baldon and Toot Baldon), with encouragement from central Government and SODC, produced a local **Neighbourhood Plan** in 2018. This exercise, which involved extensive local discussions and consultation, detailed the unique

character of the Baldons and the neighbouring environment, which should be recognised and safeguarded in future planning decisions. As part of this work a detailed Landscape Character Assessment was carried out by independent landscape specialists. The Baldons Neighbourhood Plan (BNP) states, for example, that “*Open Green Space is open countryside and agricultural land. It is part of the Green Belt and lies outside and distinct from the established settlement areas of The Baldons. The BNP will not allow development in Open Green Space land.*” and “*Its landscape is a complex interrelationship between the scale and type of agricultural pattern, land use, field parcel sizes, variation in topography, the rich pattern of tree and hedgerow: all help to define the physical characteristics of the Baldons and make it special, unique.*” and “*The understanding of landscape is enriched by the visual experience of views across, through and over the immediate countryside, from the roads within the village and from well used footpaths. Many of these views and visual connections are well documented and much loved.*”. The SODC Plan proposals appear to take no account of our Neighbourhood Plan which was formally agreed by residents.

- The north of South Oxfordshire will potentially be subject to a separate large-scale planning development in the near future – arising from the proposed **Oxford-Cambridge Expressway** and its associated large-scale housing development proposals. It therefore seems completely inappropriate and premature to agree the SODC plan until the plans and ramifications of the Expressway are better understood.

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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