

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	Robert James Donaldson
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: Policy STRAT 13: Land North of Bayswater Brook

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.

Lack of Legal Compliance: 1. The isolated parcel land north of Sandhills and south of Bayswater Brook known as Bayswater Farm, has never been included in any Section 18 consultation for LP 2034, nor any of the "five previous consultations" claimed by SODC in the SODC Local Plan Publication factsheet. It does not feature in the Strategic Site Selection Background Paper 2. The Section 19 consultation period of 6 weeks is inadequate for the public to be properly consulted on this specific part of the plan. The correct, democratic and legally compliant process would be to hold a Section 18 consultation and to ensure that all evidence and documentation could be scrutinized in detail.

No Sustainability Appraisal Process (to appraise the social, environmental and economic effects of the plan) have been undertaken on the Bayswater Farm site.

2. SODC has a statutory duty to protect the Oxford Green Belt. National Planning Policy Framework (NPPF) and the Ministry of Housing, Communities and Local Government (MHCLG) make clear that new housing in the Green Belt is to be avoided except in exceptional circumstances.

Local Plan STRAT 1, STRAT 6 on the Green Belt contravene NPPF guidelines that require Local Authorities: to avoid development that encourages the unrestricted sprawl of large built-up areas (ie Oxford city); prevent neighbouring towns merging into one another (SODC plan would facilitate this), assist in safeguarding the countryside from encroachment (SODC policy actively destroys rather than protects the countryside); preserve the setting and special character of historic towns (ie Oxford).

SODC's approach to managing the Green Belt is also non-compliant with NPPF para 118b, 133, 134, 143 & 144. Green Belt Assessment of Strategic Sites in South Oxfordshire (December 2018) rates as high, the harm to the Green Belt from developing Land North of Bayswater Brook (appraised as Lower Elsfield and Wick Farm): 'Development of the site as a whole would therefore lead to significant harm in relation to urban sprawl, encroachment on the countryside and to the setting and special character of Oxford.' (p.26 Lower Elsfield, p. 28 Wick Farm).

With specific regard to Bayswater Farm site, not only is this Green Belt land but part of an Area of Outstanding Natural Beauty. Cited by John Milton in his poem "Forest Hill" (1643) he noted "Meadows trim with daisies pied,/Shallow brooks, and rivers wide:" The site was rejected for development on three previous occasions, each cited below:

14/12/1961 Oxon County Council Planning Refusal of Permission to Build: "It would be detrimental to the amenities of the locality and this rural landscape and amenities of the locality."

12/2/1973 Oxon County Planning Refusal of permission to build. The proposed site of the field east of the Bayswater farmhouse is in an area of great landscape value and within an area under the National Parks & Access to the Country Side Act 1949, it is designated as one of outstanding natural beauty and the development would be detrimental to the amenities of the locality and the rural landscape."

12/2/1973 Oxon County Planning Refusal of permission to build: "The site has a pleasant undulating appearance with views extending beyond the appeal boundary. The number of people who regularly use the attractive bridle path and benefit from this view is unknown, but there is an unquantifiable loss of amenity."

26/9/1989 SODC Refusal of Planning Permission "This site is not allocated for housing and would undesirably extend the limits of Sandhills into the attractive open countryside adjacent to Bayswater Brook in an area of great landscape value - we will seek to conserve and enhance the quality of the landscape and protect it from development of this site for residential purposes that would have a serious effect on the character and appearance. This large scale development would be contrary to green belt policy and there is no justification for an extension of residential development beyond the clearly defined limits of Sandhills into the attractive open countryside beyond."

Soundness: The basis of the plan is flawed. To satisfy the projected housing requirements in its own jurisdiction and its contribution to the unmet housing needs of Oxford, SODC estimates that 22,775 houses need to be built between 2011 and 2034. However, the plan put forward is for 28,465 homes – 5690 homes more than required. Much of this proposed housing is planned to be within existing Green Belt Land.

Furthermore, even the 22,775 figure is misleading, because it includes substantial additional housing needs as a result of the Oxford Growth Deal (part of a government initiative to develop one million homes between Cambridge and Oxford along the "arc" created by the Varsity Line rail link and the proposed "Express Way" dual-carriageway road). The true SODC housing need for the next 23 years (without factoring in the Oxon Growth Board demands) is only 14,421 houses. Therefore, there is a need to re-present the LP 2034 not as an updated plan, but rather as a new, politically, strategically and financially (£215m has been promised to Oxfordshire towards new infrastructure, for example, as

part of the Oxon Growth Deal) motivated plan providing greater clarity on the true housing needs for SODC and Oxford city residents (excluding commuters) and justification for the wanton destruction of Green Belt land.

For Sandhills community the risk of losing the Bayswater Farm site would amount to a loss of a valued amenity. The estate has little of no amenities (no shop, church, community centre, village hall, post office, pub or youth centre). All that the residents have is a very modest toddler's playground and the above cited "attractive bridle path" with views across the valley formed by the Bayswater Brook. The meadow itself (the proposed site of development of 120 houses) and the woodland surrounding the Bayswater Brook at this point are unspoilt natural resources that have remained so for millennia. Within the rich, abundant and mature deciduous woodland is a thriving natural habitat for many species of birds and animals, including fox, wild boar, red, roe and fallow deer, squirrels and water voles. A thorough environmental impact assessment, forming part of a revised plan, should detail the threatened loss of these natural resources, fauna and flora.

Finally, the proposed new development at the Bayswater Farm site would increase levels of noise, pollution, traffic and introduce new threats to vulnerable pedestrians (such as school children) who use the bridle way (which would be crossed in two places by the proposed access roads) to walk to and from school each day.

Oxford, like many UK cities suffers from poor air quality and rising levels of traffic and noise and air pollution. The proposed construction of new roads bringing additional traffic, noise and pollution to a quiet semi-rural environment, with very limited local amenities and on a green field site runs contrary to the need to reduce air and noise pollution, protect greenfield sites and protect the more vulnerable road users from the dangers inherent with traffic. Should the proposed new access roads be linked to Barton via the Bayswater Farm Road, it would open up a new rat run which would open up Sandhills to enormous quantities of choking and unacceptable traffic levels by vehicles using the route to avoid the tailbacks on the A40 westbound and Bayswater Road southbound (both currently completely jammed with traffic at peak commute times) onto the narrow and poorly designed roads of Sandhills which would turn the quiet residential roads into an urban bottleneck bringing noise, air and traffic pollution to the area.

For all of the reasons stated above, this is not a sound plan and should be rejected.

Comply with the Duty to Cooperate: SODC have not complied fully in this regard. Local parish council members were not informed in advance of the LP 2034, and only became aware of the plans to destroy the natural environment of Bayswater Farm in early January 2019. Nor have local residents been consulted (as mentioned above, re: no Section 18 consultation). For such a huge, damaging and far-reaching plan this has all of the impressions of being hurried through with as little cooperation and consultation as possible.

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.

Remove the Bayswater Farm site from the plan for all of the reasons stated above.

Q9. Please upload any supporting documents below:

- File: IMG_20190201_080025.jpg - [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?

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