

South Oxfordshire Local Plan 2034

Page 3: Part A - contact details

Q1. Are you responding as an:

Business / Organisation

Page 6: Business / organisation contact details

Q4. Due to the plan-making process including an independent examination, a name and means of contact is required for your comments to be considered:

Business / organisation name Drayton St Leonard Parish Council
Contact name Charles Dickerson
Address line 1 [REDACTED]
Address line 2 [REDACTED]
Address line 3 [REDACTED]
Postal town [REDACTED]
Postcode [REDACTED]
Telephone number [REDACTED]
Email address [REDACTED]

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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: Local Plan 2034 STRAT1 p28, STRAT 2 p35 STRAT 5 Density

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.

Overall Strategy STRAT1 (P28)

South Oxfordshire's Stated Housing Need.

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

There has been a recent small reduction in S. Oxon's stated housing need, following replacement of earlier SHMA figures by those derived from the "Standard Method". Following this revision, and ongoing uncertainty, there is an overall need for a much more modest addition to the housing stock than that presented in the Plan; the new Local Plan again presents SODC's housing need as a given; there is no clear statement of how the new number is arrived at, or (and very importantly) the assumptions that underlie the calculations.

An additional housing need is imposed by the Housing and Employment Requirements given in STRAT 2 (P35, addressing SODC's need to contribute to the Growth Deal). Again, there is no means of verifying actual need under this heading, other than the need to generate income from sale of houses.

In short, South Oxfordshire is to suffer total change in its rural character, in exchange for a stated overall housing need that is not verifiable. This is unsound.

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.

At the least, the plan should display a reasoned calculation of actual housing need. This need might be tested by staging development proposals in response to ongoing demand, or indeed lack of it. 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,

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

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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:**

Location Plan 2034 STRAT 6 Green Belt p43, STRAT 10 Berinsfield, Map Appendix 4 p261 STRAT 7 Chalgrove, STRAT 8/9 Culham, Plan Policy ENV 1.

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.

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 a sustainable policy.

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" (P43) and totally inconsistent with national planning requirements, which call for development only in "exceptional circumstances". No such circumstances are set forward in the Plan.

Taking two examples from the seven sites, the Plan's proposals for Culham (STRAT 8/9) and Berinsfield (STRAT 10) do not offer exceptional circumstances to justify the removal of such large tracts of land from the Green Belt; there is no definable need, and building on the proposed Culham site takes the Abingdon conurbation (where development could equally well take place in a sustainable form) across the R. Thames into attractive, wooded countryside.

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 and funding of the 'Regeneration Package'.

Further to comments above relating to the Green Belt, the whole thrust of Policy STRAT 10 is concerned with the funding of the 'regeneration package' for the existing Berinsfield village and offers no justification for the removal from the Green Belt of an adjoining area of agricultural land more than three times the area of the existing Berinsfield settlement. The policy also requires that the regeneration funding must be wholly provided through the development of 'around' 1,700 houses and 'around' 5 hectares of Employment Land. A Scoping Application P17/S3835/SCO by London based planning consultants, instructed by South Oxfordshire District Council is revealing. It seeks to demonstrate that it is only by SODC developing houses on Green Belt land that the regeneration scheme can be supported. This will entail:

- The purchase of land by SODC, if necessary by using compulsory purchase power
- The grant of planning permission by SODC by SODC's own Planning Committee
- The building of the approved housing
- The sale of this newly built housing by SODC acting as a developer
- Application of profits from the sale of the newly developed properties to meet 'the entire cost of the necessary regeneration package'.

The requirement to limit the 'land take' to an area 'no greater' than required to cover the required funding is fundamental. However, even the most detailed calculations of the total expenditure on the proposed development and related infrastructure, the assumed sale values of properties anticipated to be achieved and therefore the required extent of the land to be approved for development, will be impossible to estimate with any degree of accuracy and therefore unsound. Furthermore, we contend that the use of Green Belt land to fund the regeneration of an existing settlement does not constitute 'exceptional circumstances' under the NPPF and is therefore not justified and therefore unsound.

It is noted that any land that is carved out from the Green Belt and not subsequently needed for development by SODC, will be used 'to provide green infrastructure' around the settlement edge. This we consider unsound as it will leave open opportunities for speculative development applications in perpetuity on the land designated 'green infrastructure'.

The foregoing part of this submission is mainly a revised version of our 2033 Plan representation. It takes into account the rewording by SODC of STRAT8 (now STRAT10) and also inclusion of new content reflecting OCC concerns on Transport and the like. We note that SODC decided at their May

2017 meeting to withdraw the 2033 Plan. This led to the re-worked 2034 version being published for consultation in December 2018. This contains three new housing allocation sites, including Grenoble road; the justification for adding these being concerns about whether individual sites could be delivered during the Plan period. We have noted from detailed SODC published material that the site where greatest concern had arisen is the Chalgrove Airfield site, where there remains sustained and determined opposition by Martin Baker to being displaced in favour of a planned 3000 houses.

We contend that in the case of Berinsfield there is a similarly cogent case to be made for not being able to rely on its deliverability. Many uncertainties affect it where we have only one developer, in the form of SODC itself as planning authority, faced with an increased number of demands by OCC as Highways and Education authority to provide or contribute to open ended funding of transport infrastructure required to be provided as detailed under STRAT10 para 2(vi). All these costs will be expected to be met by SODC from completed house sales, as must be "the entire cost" of the regeneration of the existing village. Would not an informed observer from elsewhere in the country (including the Inspector judging the whole elaborate scheme) label it ill conceived, unlikely to be delivered and thus not "sound" in terms of the Plan?

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

N.B. the nature of the proposed ("green infrastructure") associated with the inset land is not defined, and is unknowable. The map (see below, transcribed from P261 in the Plan) shows how the area inset from the Green Belt crosses over the parish boundary, and strays significantly into Drayton St Leonard parish:

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

Intrusion of the Berinsfield allocation to the NE, into Drayton village is unjustified. The Parish Council can only come to the conclusion that this area has been set aside for unspecified further development at a later date. 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" (P 167, Natural and Historic Environment)

5. Transport and traffic.

The Parish Council has for a long time been concerned about the potential impact of high volumes of traffic which will inevitably be generated by any new housing in or adjoining Berinsfield village, much of which would use our village road to access the M40 and beyond. 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 nearby highways. Building on such a scale in Berinsfield is therefore unsound, without indication of how road infrastructure is to be designed to take through traffic away from Drayton St Leonard village. We reserve the right to give evidence on this aspect.

6. Minerals and Waste

STRAT 10 adds to the long-standing confusion over the future of land at Berinsfield.

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 new Minerals and Waste Local Plan). OCC has recently given SG09 minerals allocation a raised priority for minerals provision. SODC's own map is appended, below (SHELAA Published Jan 2019). It shows conflict between projected housing development sites, their underlying Green Belt in-setting, and minerals site allocations.

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.

Reconsider the need for the figure of 1700 houses as put forward in the STRAT 10 Plan for Berinsfield. Such a doubling of the size of the village cannot be justified on Green Belt grounds alone; a much more modest development should be considered, in line with the stated need of village residents. A Plan must also give clarity and justification of housing need; it is therefore unsound, as it stands. Work with OCC to create, and state a clear strategy for road infrastructure and transport needs between large developments within a rural setting. Such a strategy should recognise, and quantitate the additional Green Belt land required for roads, in addition to that required for estimated housing needs; the Plan is, otherwise, unsound.
Assign priorities between minerals exploitation and verifiable estimates of housing need. Without a clearly stated policy in respect of these, for specific sites, the Plan is unsound.

Q16. Please upload any supporting documents below:

- File: Maps support Local PI response.docx - [Download](#)

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?

Yes

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Q19. 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: Local Plan 2034 Policies ENV 9, ENV 10 Paras 8.37 and 8.38 pp184 and 185

Q20. Do you consider the Local Plan and supporting documents:

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are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?	X			

Q21. 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.

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 of Berinsfield coincides with a nationally important, complex, multi-period archaeological site. This site is described in the book "Neolithic to Saxon Social and Environmental Change at Mount Farm Berinsfield, Dorchester-on-Thames" auth. George Lambrick, Oxford Archaeology Publ. 2010.

See accompanying map, which shows the location and impressive density of features, as indicated by cropmarks. It also indicates 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 understood by the Airfield Preservation Trust, the site being described in <http://www.abct.org.uk/airfields/airfield-finder/mount-farm/>

Q22. 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.

There should be a clear statement of recognition of the importance of these heritage assets, and how they might be preserved. Conflict between these, the proposed size of development and minerals exploitation should be recognised and prioritised in the Strategic Plan.

Q23. Please upload any supporting documents below:

- File: Maps support Local PI response.docx - [Download](#)

Q24. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q25. Would you like to comment on another policy or paragraph?

Yes

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Document / Policy / Paragraph: TRANS 1 Expressway

Q27. Do you consider the Local Plan and supporting documents:

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are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?	X			

Q28. 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.

Very briefly touched on in the Plan, the Ox-Cam Expressway adds an additional, huge level of uncertainty to the Plan. Its terms of reference include a massive addition to the developments put forward in the Plan, given that South Oxfordshire is a likely target for a devastating change to its countryside and character. Without recognition of the potential impact of the Expressway, and how to deal with it, the Plan is unsound.

Q29. 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 must give a clear indication of how SODC intends to respond to the Expressway proposal to be considered sound.

Q31. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q32. 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