

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	Dr
Full name	JOHN DRURY
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: strat1,6,11,12,13

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.

Objective 7.1

Strat 1

Strat 6. NPPF 13 133-147

Strat 11,12,13

I object to the removal of a large area of green belt.

I object to the inclusion of the proposed developments at Northfield, Grenoble Road and Bayswater Brook.

I request that these sites are removed from the local plan

The Consultation response to the first publication the November 2017 "final publication 1 " local plan strongly supported the need to maintain the Green Belt. This was entirely in keeping with the guidance in the NPPF of the time, reflecting government policy and ministerial statements and the consultation response.

Why was a second local plan prepared?

The answer is at page 9 of the local plan.

1.12 The 2014 SHMA identified SODC housing demand greater than previously planned and

1.13. Oxford City Council indicated that they would have difficulties in meeting their identified housing need entirely within the city boundary and that other districts across the County could be asked to consider taking some of this "unmet housing need"

At the Council special meeting of 27 March 2018 Council " voted against submitting the plan for independent examination in its current form"

Further cabinet and council meetings agreed the program of work, timetables and finally the local plan published version in May, August and December.

When and where were issues of green belt debated?

My reason for objecting to the removal of Green Belt is as follows:

NPPF 13 "Green Belt exists to prevent urban sprawl." Three of the strategic sites are classic examples of urban sprawl.

Government policy and official guidance (NPPF 133-137 and PPG) allow a small number of specific types of development on green belt, otherwise exceptional circumstances must exist.

Exceptional circumstances must be evidence based.

Objective 7.1 Strat 1

"Protect and enhance the natural environment, including biodiversity, the landscape, green infrastructure and our waterways, placing particular importance on the value of the Oxford Green Belt....."

Where and how is the particular importance on the value of the Oxford green belt explored in this plan?

A high weight should be given to green belt. There is no evidence that such weight has been applied.

Strat 11 Grenoble road

4.96 there will be some Green belt harm from releasing this site for development. However, the exceptional circumstances for releasing this land justify this harm. these include: (a) the provision of a new park and ride site to the south of Oxford; (b) an opportunity to provide an extension to the South Oxford Science Park, and (c) the ability to contribute to the regeneration of Greater Leys. Policy Strat11 includes mitigation measures to require the creation of the site and surrounding villages

Harm is identified.

Is a park and ride scheme a justification? Is there a precedent for this?

A small economic site is not an exceptional circumstance.

The contribution to greater Leys is minimal.

Strat 12 Northfield

4.104 the site is entirely within the Oxford Green Belt. The Local Plan therefore proposes to inset this site from the Green Belt. the site specific exceptional circumstances for doing this are stated as:

- the development of this site will help to provide for Oxford City's unmet housing need, including affordable housing need, adjacent to and related to where that need arises

It is adjacent to the city boundary but few cycle into town and less walk. The ring road and roads into town are very busy.

Strat 13 Bayswater Brook

4.107 Land north of Bayswater Brook directly adjoins the eastern boundary of Oxford city. The site is entirely within the Oxford Green belt. The Local Plan proposes to inset this site from the Green Belt. The exceptional circumstances for doing this are stated as:

- the site's proximity to major employment locations and a wide range of services and facilities means that there is high potential to support travel by walking and cycling;
- the site is well positioned to connect with public transport provision in Oxford city; and
- the development of this site will help to provide for Oxford City's unmet housing need, including affordable housing need, close to where that need arises.

Local experience is that Oxford bus services have been reduced in SODC. While the distance is short and walking and cycling to John Radcliffe (the only local large employer) would be possible, the A 40 has to be crossed.

Local experience is that Oxford bus services have been reduced in SODC.

Affordable housing--- the first release of two bedroom apartment at Barton Park (the adjacent site) are listed at £372,000 with 3 bed house £595,000. Only 40 % of the development is rented social housing.

The green belt assessment of strategic sites in South Oxfordshire, final report December 2018 demonstrates harm at the selected green belt sites adjacent to Oxford.

When green belt is removed, all reasonable alternatives should be explored. Where is this documented?

There is no discussion in the document of alternative solutions to Oxford city's unmet need, for instance higher density housing or less commercial and academic land permissions or affordable homes.

An Oxford golf course is preserved but not green belt in SODC.

Where is the public examination of the exceptionality in this local plan?

Which council minutes refer to this?

What weight is allocated to access by foot, bicycle and public transport when assessing sustainability?

What weight is given to the protection of the green environment and Green Belt?

What was the weight given to Oxford city's housing need versus the loss of benefits of Green Belt? Was that considered and documented? Is this publicly available?

Green belt should receive considerable weight. Can this be demonstrated?

As is their right, if Oxford city continue to allocate land for industrial and educational purposes rather than solve their unmet housing need by more affordable homes (see above) and walking and cycling remain as sustainability criteria ("housing close to it where the need arises SODC meeting December 2018") then this must lead inevitably to further large losses of Green Belt. Should this obvious possibility have been debated in public by SODC? There is no mention of this in Green Belt strategy (STRAT 6) of this obvious possible consequence.

NPPF 139 states when defining Green Belt boundaries plans should (Para e) "be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period" (permanence) Why is this missing from strat6?

The Oxfordshire housing and growth plan clearly is one of the major drivers of the local plan. Was this subject to consultation at section 18? Was there any consultation on the Growth Plan?

How does the Growth plan address green belt issue?

What role did the Growth Board play in developing the growth bid and did it have a material impact on SODC decision making?

If so were appropriate governance arrangements in place at all times?

The growth board scrutiny panel at their November 2018 meeting commented on and made recommendations on transparency and communication, votes on formal decisions with a record of the vote and the need to remain fully committed to public engagement.

Although the council had sought and received comments from a very wide range of interested parties , they summarily dismissed the letters from residents of Horspath. While that could not be counted as part of the section 19 consultation were the residents debarred from commenting as interested parties?

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.

The strategic sites at Grenoble Road, Northfield and Bayswater Brook should be removed from the Local Plan

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