

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	Ms
Full name	Susan Fawcett
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	

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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: PolicySTRAT11:Land South of Grenoble Road

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.

1. Legal Compliance

- I do not consider the Local Plan to be legally compliant because proper consultation (under Regulation 18) has not taken place.
- There has been NO consultation on THIS plan, changed at the 'eleventh' hour as it has been to include new housing sites; many on Green Belt land.
- It is significantly different from the agreed plan in 2017, and could render much of the local work on our Neighbourhood Plan redundant.
- It is further uncoordinated with other plans- like the equally unconsulted upon Expressway plans. - Local residents were originally consulted on a geographically different plan for 23,000 homes which was rejected by the Council. The new Plan for 28,000 homes focuses on completely different sites; is on a much larger scale; and now removal of land from Green belt is proposed. Our Local District Councillor, one of the Councillors who voted against the changes, was one of six councillors who was 'suspended' following their opposition. I think this is totally undemocratic and demonstrates an utter disregard for the views of the electorate and a desire to pursue unsustainable disproportionate economic growth regardless of actual need and the overwhelming views of local residents and their elected representatives.
- The "exceptional circumstances" under National Policy Guidelines needed to remove the Grenoble Road site from the Green belt have not been satisfactorily established and is based on an assessment of housing need in Oxford City which is unproven. Indeed the 28,000 homes the council is planning for is almost 3 times the 10,000 that are 'needed' according to the latest Government assessment.
- I would also argue that planning for housing and related infrastructure beyond proven need is in conflict with duties under the Climate Change Act 2008.

2. Unsound – not positively prepared, justified or consistent with national policy

Why?

I do not consider the local plan to be sound for many reasons -

- It is not based on good evidence. National Policy Guidelines require Councils to release Green Belt land for NEEDED housing only after all other options have been explored AND if no other land is available on which need could be met. No credible "exceptional circumstances" have been suggested.
- The extreme and unsustainable level of development proposed results not from any estimate of actual housing need but (as the Plan makes clear at p35) only from some Council members perceived imperative to get the money promised by the Oxfordshire Housing and Growth Deal, itself flawed public policy. The most sustainable option for the City's housing need is that it should be met within the City itself rather than prioritising commercial and employment development, and, as Oxford's own Local Plan has yet to be examined there is still no sound figure for any actual unmet need. The new official Government needs calculation, based on work by our MP John Howell shows that in fact only 15,000 houses are needed in Oxford, half the level of the discredited SHMA forecast. It has been evidenced recently that need has been substantially overestimated except as required to meet the Oxfordshire Growth Deal, which in itself is flawed and unsound - scarce public funds for development would be much better targeted in areas of the country where opportunity and affluence are sorely needed, not in the already over-developed and affluent South East, let alone rural Oxfordshire. The Plan is driven by the interests of the non-elected Oxfordshire Growth Board, influenced by Developers hungry for profits in an area where land and subsequent property values are much higher than elsewhere, and a local Council desperate for this injection of Government cash at any cost.
- Oxford City Council says it does not have the room to build needed homes in the centre of the city, yet for decades it has used spare land for commercial use rather than housing. This is not in keeping with the preservation of Oxford's 'special' historic character, and should not be used as a reason to dispense with our precious Green Belt. Oxford City is unsuitable for expansion on the scale contemplated; it will harm the City's character and economy, which relies on tourism and being an attractive place to work and live.
- Green belt land has the additional benefit of mitigating the causes of climate change (see CPRE Report - 'Green Belt; A Greener Future p83). We should be protecting our Green Belt more than ever now. At a time when the 'tipping point' of environmental disaster is becoming ever nearer, and even Oxford City Council itself, in common with many other Local Authorities, has passed a Climate Emergency motion, unnecessary development on Green Belt land, which will lead to a loss of natural habitat and Oxford's invaluable 'green lungs', is impossible to justify. It will represent a loss of green space which is an extremely important amenity for people and an irreplaceable habitat for already pressured wildlife, not least our dangerously declining pollinating insects and bees. Where will local people exercise and get fresh air without getting in their cars and driving miles adding to already severe air pollution?
- The valuable Green Belt would be replaced with overly dense housing; gridlocked roads; worsened air pollution in an area where this is already a public health problem - the residents of Greater Leys already experience some of the worst ill health caused by air pollution, diesel emissions settling as

they do over the 'basin' that encloses Oxford city; and the river Thames further polluted with processed sewage.

-The Kirkham Green Belt Assessment Report concluded that all major parcels of the South Oxfordshire Green belt fulfilled one or more of the five functions of the Green belt.

-A 2015 CPRE commissioned survey found that the vast majority of Oxfordshire's residents support the preservation of Oxfordshire's Green Belt.

-SODC's own 2015 report noted that Grenoble Road's openness, together with its high amenity value, evident to all who visit it, provided a strong sense of containment of the City.

-The plan itself quotes SODC's own Strategic Sites Green Belt Study as saying that Grenoble Road development would be urban sprawl, and of course preventing just such urban sprawl was the core purpose for which the Green Belt was created. This remains true, but I would argue that we need to look at the value of Green Belt as more than purely visual in these environmentally challenging times.

-Green Belt is vital as an environmental 'buffer-zone', part of the 'green lungs' needed to ameliorate the worst effects of air pollution and CO2 emissions, as well as an essential wildlife 'corridor'.

-CPRE's report 'Green Belt: A Greener Future' makes very compelling reading as to how we could be preserving this valuable resource and enhancing its benefits for future generations rather than the proposed folly of concreting it all over just to get a Central Government short term 'quick fix' for a cash-strapped Local Council.

In short the "exceptional circumstances" that allow for the development of Green Belt have not been satisfactorily established. The harm caused by removing the Grenoble Road site, as well as the others proposed, from the Green Belt greatly outweighs any potential benefit to the area and local community.

As regards Transport and Infrastructure

-An urban extension to the South of the city will mean thousands more people trying to get down Cowley or Iffley Roads to shop and work in the city.

- there are inadequate plans to improve the infrastructure (roads, public transport, sewerage, shops, doctors and other amenities) to support this development.

-It will make cycling in the area even more dangerous.

-The proposed Park and Ride will attract more traffic up the A4074 through Nuneham Courtenay, especially if the Redbridge Park and Ride is to be closed in favour of this new Park and Ride as has been proposed elsewhere. This makes no logical or environmental sense whatsoever.

-Routes for buses to get into the City Centre will have to be on roads that are already very congested, especially in rush hours. Cowley and Iffley Roads and the Southern By-Pass are often at a standstill for several hours each day.

-The proposed Cowley branch line rail service will be too far from the Grenoble Road site to be useful. Therefore those working in Oxford or commuting further away will be adding traffic to already congested roads.

As regards Local Amenity and the Environment -

- the development would have a major impact on the nature of the local environment and people's enjoyment of it. It will reduce access to the local countryside as an amenity for residents of Oxford, Blackbird Leys and Greater Leys - paths, dog walking routes, wildlife, access to the river etc. Blackbird and Greater Leys is itself already a very dense development increasing the need for natural space surrounding it.

-the proposed estate of 3,000 homes will inevitably increase noise, air and light pollution. The proposed density of 70 dwellings per hectare is totally out of keeping with a semi-rural village in the Green Belt and inappropriate to a semi-rural location. It is higher than most new developments except in a city center setting.

What this will mean for us as residents in the Parish of Sandford-on-Thames ?

-The village will be completely engulfed by the City. The impact upon daily life will be a very significant increase in traffic congestion, noise, and a reduction in air quality impacting on our health; loss of a distinct Parish identity, ambience and quality of life; destruction of natural habitat and increase in light pollution; almost certain absorption into Oxford, which itself will lose some of its special historic identity in the pan-urban sprawl contemplated by the Plan's pursuit of growth in housing and road transport at any cost, despite clear evidence that we are facing impending environmental catastrophe unless carbon emissions are significantly reduced.

-The Park Home site, of which I am a resident, will be completely cut off from the rest of the village and dwarfed and isolated by the surrounding development, further exacerbated by the proposed Park and Ride adding unacceptable levels of noise and air pollution in a residential setting, and the proposed expansion of the Science Park will overlook and shade our homes, interfering with our right to light during the day, and polluting our night with perpetually lit office developments. The development will ruin our quality of life and enjoyment of our homes.

An incidental consequence of removing the land from the Green Belt will also allow our site owner (who himself lives elsewhere) to cover our small 'recreation' field with more park homes in order to increase his income. He has indicated he is in favour of the proposed development for this reason. This will mean further loss of amenity for us.

3. Compliance with the Duty to Cooperate

- I do not believe this has been fulfilled as the Plan is not based on good evidence and it has not been produced cooperatively with other agencies (eg Highways England, Highways Department of OCC or

with enough consideration of transport and sustainability of the local environment, flying in the flying of all the evidence of the CPRE and other environmental organisations as it does.

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.

There are no "exceptional circumstances" to justify removal of land from the Green Belt for development and every reason why the Green Belt land should be taken out of the Local Plan 2034's proposed sites for development, as it would be a catastrophic loss to the Parish of Sandford-on-Thames, the City and the County.
The Council should find appropriate sites NOT within the Green Belt if it is determined to build these 3,000 unnecessary homes in order to qualify for the Oxfordshire Growth Deal.

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: STRAT 1 - OVERALL STRATEGY

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.

1. Legal Compliance

- I do not consider the Local Plan to be legally compliant because proper consultation (under Regulation 18) has not taken place.
- There has been NO consultation on THIS plan, changed at the 'eleventh' hour as it has been to include new housing sites, many on Green Belt land.
- It is significantly different from the agreed plan in 2017.
- It is further uncoordinated with other plans- like the equally unconsulted upon Expressway plans. - Local residents were originally consulted on a geographically different plan for 23,000 homes which was rejected by the Council. The new Plan for 28,000 homes focuses on completely different sites; is on a much larger scale; and now removal of land from Green belt is proposed. The Plan is pursuing unsustainable disproportionate economic growth regardless of actual need, environmental factors, and the overwhelming views of local residents and their elected representatives.
- The "exceptional circumstances" under National Policy Guidelines needed to remove the Grenoble Road site and others from the Green belt have not been satisfactorily established and is based on an assessment of housing need in Oxford City which is unproven. Indeed the 28,000 homes the council is planning for is almost 3 times the 10,000 that are 'needed' according to the latest Government assessment.
- I would also argue that planning for housing and related infrastructure beyond proven need is in conflict with duties under the Climate Change Act 2008.

2. Unsound – not justified, effective or consistent with national policy

Why?

This Plan is unjustifiable in its scale and beyond the capacity of this mainly rural District to accommodate.

The Plan calls for almost 30,000 houses to be built compared to the official Government forecast requirement of 10,000. That would be a 40% increase in SODC's total housing stock in just sixteen years. It also implies 20,000 new households coming into the District between now and 2034, stretching its services and risking the coherence of its settlements.

It would require a step change in building rate from 600 houses a year to 1,500 each and every year from now to 2034. This is undeliverable. Also opening up too many sites allows developers to 'cherry pick' the sites on which development would be most harmful and ignore those on which it is more acceptable. The extreme and unsustainable level of development proposed results not from any estimate of local needs but (as the Plan makes clear at Page 35) only from the Council's perceived imperative to get the money promised by the Oxfordshire Housing & Growth Deal. This involves £215 million from Government in return for a commitment to building 100,000 houses – translating as just £2,150 per house or to look at it another way £3,000 per unnecessary house (ie houses recognised by the Deal itself as being over and above recognised need).

3. Compliance with the Duty to Cooperate

- I do not believe this has been fulfilled as the Plan is not based on good evidence and it has not been produced cooperatively with other agencies (eg Highways England, Highways Department of OCC or with enough consideration of transport and sustainability of the local environment, flying in the flying of all the evidence of the CPRE and other environmental organisations as it does.

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.

Modifications needed

The District's actual housing need is effectively met within the numbers in the already adopted 2026 Local Plan, so there is no urgent requirement for a new Plan now at all, or any apparent public benefit from producing one.

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:

STRAT 2 - NEED FOR NEW DEVELOPMENT (includes Oxford's 'unmet' need)

Q20. 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		

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.

1. Legal Compliance

- I do not consider the Local Plan to be legally compliant because proper consultation (under Regulation 18) has not taken place.
- There has been NO consultation on THIS plan, changed at the 'eleventh' hour as it has been to include new housing sites; many on Green Belt land.
- It is significantly different from the agreed plan in 2017.
- It is further uncoordinated with other plans- like the equally unconsulted upon Expressway plans. - Local residents were originally consulted on a geographically different plan for 23,000 homes which was rejected by the Council. The new Plan for 28,000 homes focuses on completely different sites; is on a much larger scale; and now removal of land from Green belt is proposed. The Plan is pursuing unsustainable disproportionate economic growth regardless of actual need, environmental factors, and the overwhelming views of local residents and their elected representatives.
- The "exceptional circumstances" under National Policy Guidelines needed to remove the Grenoble Road site and others from the Green belt have not been satisfactorily established and is based on an assessment of housing need in Oxford City which is unproven. Indeed the 28,000 homes the council is planning for is almost 3 times the 10,000 that are 'needed' according to the latest Government assessment.
- I would also argue that planning for housing and related infrastructure beyond proven need is in conflict with duties under the Climate Change Act 2008.

2. Unsound – not positively prepared, justified, effective or consistent with national policy
Why?

See response to STRAT 1 above.

The most sustainable option for Oxford's housing requirement is that it should be met within the City itself. Since Oxford's own Local Plan has yet to be examined by a Planning Inspector, there is as yet no sound figure for any unmet need.

If Oxford City prioritised land for housing, rather than employment, and built at densities appropriate to a City, it could accommodate as many as 26,000 houses which would be its full need as identified by the Oxfordshire Strategic Housing Market Assessment 2014 (SHMA).

What's more, the new official Government need calculation, based on work by our own MP John Howell, shows that Oxford in fact needs only 15,000 houses, half the level the discredited SHMA forecast. This is backed up by a new update for the City, produced by the original SHMA authors GL Hearn, which also indicates that Oxford's need has been substantially over-estimated, except as required to meet the Oxfordshire Growth Deal.

3. Compliance with the Duty to Cooperate

- I do not believe this has been fulfilled as the Plan is not based on good evidence and it has not been produced cooperatively with other agencies (eg Highways England, Highways Department of OCC or with enough consideration of transport and sustainability of the local environment, flying in the flying of all the evidence of the CPRE and other environmental organisations as it does.

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.

Modifications needed

See as for STRAT 1

The allocation for Oxford's 'unmet need' should be removed from the plan. This could be re-assessed when Oxford City has developed and agreed its own plan.

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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Q26. 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 / STRAT 6 - GREEN BELT (also relates to the site specific policies: STRAT 8 & 9 –
Policy / Culham, STRAT 10 – Berinsfield, STRAT 11 – Grenoble Road, STRAT 12 – Northfield,
Paragraph: STRAT 13 – Bayswater Brook, STRAT 14 – Wheatley)

Q27. 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		

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.

1. Legal Compliance

- I do not consider the Local Plan to be legally compliant because proper consultation (under Regulation 18) has not taken place.
- There has been NO consultation on THIS plan, changed at the 'eleventh' hour as it has been to include new housing sites on Green Belt land.
- It is significantly different from the agreed plan in 2017.
- It is further uncoordinated with other plans- like the equally unconsulted upon Expressway plans. - Local residents were originally consulted on a geographically different plan for 23,000 homes which was rejected by the Council. The new Plan for 28,000 homes focuses on completely different sites; is on a much larger scale; and now removal of land from Green belt is proposed. The Plan is pursuing unsustainable disproportionate economic growth regardless of actual need, environmental factors, and the overwhelming views of local residents and their elected representatives.
- The "exceptional circumstances" under National Policy Guidelines needed to remove the Grenoble Road site and others from the Green belt have not been satisfactorily established and is based on an assessment of housing need which is unproven. Indeed the 28,000 homes the council is planning for is almost 3 times the 10,000 that are 'needed' according to the latest Government assessment.
- I would also argue that planning for housing and related infrastructure beyond proven need is in conflict with duties under the Climate Change Act 2008.

2. Unsound – not positively prepared, justified or consistent with national policy

Why?

The Plan calls for seven Green Belt sites to be developed, with all but one of the Strategic Allocations within the Green Belt and totalling over 11,000 houses (over 8,000 within the Plan period) or nearly 30% of the overall housing numbers.

National planning policy requires Councils to release Green Belt for needed housing only after all other options have been explored and if no other land is available on which need could be met.

All the Green Belt sites here fall at the first hurdle. If there is no housing need (see above) there can be no necessity. In any case no credible exceptional circumstances are suggested.

The Kirkham 2015 Green Belt Assessment report concluded that all major parcels of the South Oxfordshire Green Belt fulfilled one or more of the five functions of the Green Belt. A 2015 survey commissioned by CPRE Oxfordshire, but undertaken by an independent research company, showed that the vast majority of Oxfordshire residents support the preservation of Oxford's Green Belt.

Berinsfield is not justified...."wishing to correct the housing mix" (the justification offered) might require a little relaxation of the village envelope but can hardly justify releasing an area of land more than twice the size of the current settlement.

Culham is not justified...it is open Green Belt land by the River and only a short distance from non-Green Belt land where houses could be built instead (if any at all were needed).

SODC's 2015 report noted that Grenoble Road's openness – together with its high amenity value, evident to all who visit it - provided a strong sense of containment of the City. The Plan itself quotes SODC's own Strategic Sites Green Belt study as saying that the Grenoble Road development would be urban sprawl– preventing just such urban sprawl being of course the core purpose for which the Green Belt was created.

The same applies to Northfield and Bayswater Brook.

Wheatley Brookes site is previously developed land which can be redeveloped without removing it from the Green Belt - as argued by SODC's own officers at a Planning Committee in December. The proposed release to the East of Wheatley was deleted from the 2011 Plan by the Inspector as causing the coalescence of settlements.

3. Compliance with the Duty to Cooperate

- I do not believe this has been fulfilled as the Plan is not based on good evidence and it has not been produced cooperatively with other agencies (eg Highways England, Highways Department of OCC or with enough consideration of transport and sustainability of the local environment, flying in the flying of all the evidence of the CPRE and other environmental organisations as it does.

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.

Modifications needed

There are no exceptional circumstances to justify any of these incursions into Green Belt land and any number of sound planning reasons why they should be struck out of the Plan.

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?

Yes

Page 15: Part B - your comments

Q33. 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: TRANS 1 - OXFORD-CAMBRIDGE EXPRESSWAY

Q34. 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		

Q35. 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.

1. Legal Compliance

- I do not consider the Local Plan to be legally compliant because proper consultation (under Regulation 18) has not taken place.
- There has been NO consultation on THIS plan, changed at the 'eleventh' hour as it has been to include new housing sites; many on Green Belt land.
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- The "exceptional circumstances" under National Policy Guidelines needed to remove the Grenoble Road site and others from the Green belt have not been satisfactorily established and is based on an assessment of housing need in Oxford City which is unproven. Indeed the 28,000 homes the council is planning for is almost 3 times the 10,000 that are 'needed' according to the latest Government assessment.
- I would also argue that planning for housing and related infrastructure beyond proven need is in conflict with duties under the Climate Change Act 2008.

2. Unsound – not positively prepared, justified or effective.

Why?

Within the next two years, perhaps sooner, the decision is likely to be made on the new Oxford Cambridge Growth Corridor and well within the time scale of this plan work may have begun. It would consist of a new Expressway, bringing with it a development obligation of an estimated 10,000 houses a mile. Although it is glancingly mentioned in the Plan, the potential magnitude is not indicated, nor that the South Oxfordshire Green Belt seems to be the County Council's preferred target area, and very probably the National Infrastructure Commission's too. Not only would that mean a new ten mile "motorway" through presently open countryside South of Oxford, but the obligation to provide the 100,000 houses that go with it.

It is significant to the soundness of the plan because it would be far and away the most important event in the plan period, with the greatest impact, and, depending on its route, would not only impose a massive further housing target but also affect the site allocations that have been made in the Plan without (presumably) taking it into account.

It could potentially devastate the Green Belt South of Oxford and the open countryside and the villages within it – including Chalgrove, and Haseley/Harrington which would be likely targets for some of the 100,000 houses – and change the character of the area for ever.

3. Compliance with the Duty to Cooperate

- I do not believe this has been fulfilled as the Plan is not based on good evidence and it has not been produced cooperatively with other agencies (eg Highways England, Highways Department of OCC or with enough consideration of transport and sustainability of the local environment, flying in the flying of all the evidence of the CPRE and other environmental organisations as it does.

Q36. 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.

Modifications needed

To be sound, the Plan needs to reveal as much as is known about the magnitude and routing of this new un-voted for growth plan, its potential impact on the area and the Plan itself, and the Council's intended approach.

Q38. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q39. Would you like to comment on another policy or paragraph?

Yes

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Q40. 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: H16 - INFILL DEVELOPMENT

Q41. 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		

Q42. 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.

1. Legal Compliance

- I do not consider the Local Plan to be legally compliant because proper consultation (under Regulation 18) has not taken place.
- There has been NO consultation on THIS plan, changed at the 'eleventh' hour as it has been to include new housing sites; many on Green Belt land.
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- The "exceptional circumstances" under National Policy Guidelines needed to remove the Grenoble Road site and others from the Green belt have not been satisfactorily established and is based on an assessment of housing need in Oxford City which is unproven. Indeed the 28,000 homes the council is planning for is almost 3 times the 10,000 that are 'needed' according to the latest Government assessment.
- I would also argue that planning for housing and related infrastructure beyond proven need is in conflict with duties under the Climate Change Act 2008.

2. Unsound – not justified or consistent with national policy

Why?

This policy should be capped per village as small but long and straggling villages could end up more than doubling in size.

The policy does not reference Neighbourhood Plans and as such, it appears that Infill sites could undermine the wishes of the local community (as has recently been the case at Chinnor).

3. Compliance with the Duty to Cooperate

- I do not believe this has been fulfilled as the Plan is not based on good evidence and it has not been produced cooperatively with other agencies (eg Highways England, Highways Department of OCC or with enough consideration of transport and sustainability of the local environment and the content of Neighbourhood Plans, flying in the flying of all the evidence of the CPRE and other environmental organisations as it does.

Q43. 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.

Modifications needed

Infill in any one village should be capped at 5% of 2011 housing stock during the Plan period.

The policy should state clearly the relationship between infill development and neighbourhood plans

Q45. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q46. Would you like to comment on another policy or paragraph?

Yes

Q47. 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: H4 & Table 5f HOUSING IN THE LARGER VILLAGES

Q48. 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		

Q49. 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.

1. Legal Compliance

- I do not consider the Local Plan to be legally compliant because proper consultation (under Regulation 18) has not taken place.
- There has been NO consultation on THIS plan, changed at the 'eleventh' hour as it has been to include new housing sites; many on Green Belt land.
- It is significantly different from the agreed plan in 2017.
- It is further uncoordinated with other plans- like the equally unconsulted upon Expressway plans. - Local residents were originally consulted on a geographically different plan for 23,000 homes which was rejected by the Council. The new Plan for 28,000 homes focuses on completely different sites; is on a much larger scale; and now removal of land from Green belt is proposed. The Plan is pursuing unsustainable disproportionate economic growth regardless of actual need, environmental factors, and the overwhelming views of local residents and their elected representatives.
- The "exceptional circumstances" under National Policy Guidelines needed to remove the Grenoble Road site and others from the Green belt have not been satisfactorily established and is based on an assessment of housing need in Oxford City which is unproven. Indeed the 28,000 homes the council is planning for is almost 3 times the 10,000 that are 'needed' according to the latest Government assessment.
- I would also argue that planning for housing and related infrastructure beyond proven need is in conflict with duties under the Climate Change Act 2008.

2. Unsound – not justified or consistent with national policy

Why?

Para 5.25 states: 'The Local Plan's proposed strategy for housing distribution in the larger villages is for each settlement to grow proportionally by around 15% from the 2011 base date, plus any housing allocated to that village through the Core Strategy.' This includes a number of villages, such as Goring, Nettlebed and Woodcote, located within an Area of Outstanding Natural Beauty.

However, as established at the recent West Oxfordshire Local Plan examination, housing numbers within an Area of Outstanding Natural Beauty must be based on specific identification of local needs, not an arbitrary division of District wide needs.

3. Compliance with the Duty to Cooperate

- I do not believe this has been fulfilled as the Plan is not based on good evidence and it has not been produced cooperatively with other agencies (eg Highways England, Highways Department of OCC or with enough consideration of transport and sustainability of the local environment, or the content of Neighbourhood Plans, flying in the flying of all the evidence of the CPRE and other environmental organisations as it does.

Q50. 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.

Modifications needed

This section should be re-written to acknowledge the specific constraints of development within Areas of Outstanding Natural Beauty. Any scheme should convincingly demonstrate that it would give rise to benefits to the specific settlement or the sub-area (eg meeting identified local housing needs) and would clearly outweigh any likely harms (eg heritage, landscape, impact on local services).

Q52. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q53. 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

I would like to be added to the database to receive planning policy updates for Vale of White Horse