

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="Mr"/>	<input type="text"/>
Full Name	<input type="text" value="Alastair Froggett"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="██████████"/>	<input type="text"/>
Address Line 2	<input type="text" value="██████████"/>	<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:

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.

- Main Plan document **2.3. iv)** page 15 not compliant with NPPF on Green Belt **STRAT 1**, **STRAT 6 Green Belt** not compliant with NPPF – specifically opposes the 5 functions of the Green Belt particularly in relation to the City of Oxford –
- encourages the unrestricted sprawl of large built-up areas** – the City of Oxford
 - to prevent neighbouring towns merging into one another** – Merges Oxford into surrounding parishes and villages;
 - to assist in safeguarding the countryside from encroachment** – destroys the countryside around Oxford
 - to preserve the setting and special character of historic towns**- destroys the setting of Oxford and surrounding villages
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land** – discourages this and the building of much needed homes within the City of Oxford

(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.

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

(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:

13/02/2019

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.**

See below.

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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CONSULTATION PROCESS

- Main Document **1.6, 2.11, STRAT 1, STRAT 2 (housing requirement)**– There has been no previous consultation on this Local Plan. It is a new Plan not a modification of the previous version. The housing development numbers have increased substantially from 22,775 to 28,459 with the addition of 3 new Strategic Development Sites increasing it from 4 to 7.
- Main Document **1.6, Policy STRAT 13: Land north of Bayswater Brook**– was considered separately in the previous Local Plan Wick Farm and Lower Elsfield 2 separate sites with no linking road. ***Bayswater Farm had not been considered at all previously*** and is missing from Strategic Site Selection Background Paper 2.
- Main Document **1.6, STRAT 13 - Bayswater Farm - never been subject to a Section 18 consultation.**
- The new Local Plan was prepared in a rush. The background documents were not available electronically when carrying out the scrutiny process or when the full council voted on it.

DUTY TO COOPERATE

- Housing for Oxford City 4.29-4.31, H9, STRAT 2, Query 'unmet need' and ability to commute into Oxford.

Sustainability Study - Options for Meeting Oxford City's Unmet Housing Need p 10 – opt for Option 1: Do Nothing; since there is no unmet housing need

http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=993498942&CODE=EF310981A9A87154C87BE66944A6F8F3

SOUNDNESS – Everything else –

- Policy STRAT 13: Land north of Bayswater Brook p 68-73

South Oxfordshire Local Plan 2034 - Strategic Site Selection Background Paper

http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=994974784&CODE=79DBF26D35774E3F413F28278F0D2CB1

Proforma Site Assessment - Lower Elsfield p 143, Wick Farm - p 176

Detailed appraisals – Lower Elsfield and Wick Farm – p 396

http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=993498942&CODE=EF310981A9A87154C87BE66944A6F8F3 Sustainability Matrices – comparison table all sites P 15-16 and site selection tables p 20 conclusion below - needs challenging

“Lower Elsfield / Wick Farm Combined Site –

Selected site - In combination, the sites provide an opportunity to deliver new homes in a sustainable location adjoining a major urban area, within close proximity to employment and services and facilities. There is also a high potential for encouraging sustainable modes of travel, once A40 and Bayswater brook barriers are overcome.”

Compare with previous appraisal in 2017 where these sites were rejected - Sustainability Appraisal Appraisals SODC’s Local Emerging Plan – WICK FARM p 127 , LOWER ELSFIELD – p 143

<http://www.southoxon.gov.uk/sites/default/files/FINAL%20SA%20Report%20March%202017.pdf>

Further analysis does not seem to be available but was copied into the Beckley Neighbourhood Plan -

SUSTAINABILITY APPRAISAL MATRICES ALTERNATIVE STRATEGIC ALLOCATIONS FROM SODC’S LOCAL EMERGING PLAN – WICK FARM AND LOWER ELSFIELD – Copied into Beckley’s Neighbourhood Plan – Appendix 10 P 32 -

<https://beckley-and-stowood->

[pc.gov.uk/sites/default/files/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20Evidence%20Base%20%20Appendix%204-10.pdf](https://beckley-and-stowood-pc.gov.uk/sites/default/files/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20Evidence%20Base%20%20Appendix%204-10.pdf)

Strategic Housing and Economic Land Availability Assessment (SHELAA) (update - January 2019)

Site assessment from 2017 not updated in this more recent document. 2017 document - http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=880598959&CODE=B1D44A806056D4FE953DBA4706CECE3E

1006 - Land at Wick Farm and Lower Elsfield, Oxford (1) - ***“Unsuitable - not in accordance with emerging spatial strategy. 10% of site in Flood Zone 3b”***

1007 -Land at Wick Farm and Lower Elsfield, Oxford (2) – ***“Unsuitable - not in accordance with emerging spatial strategy. 28% of site in Flood Zone 3, 3% of the site is covered by Ancient Woodland and 3% of the site is covered by two SSSI. (One SSSI and one area of Ancient Woodland overlap but this has been taken”***

Heritage Impact Assessment – None for any of the new strategic sites around Oxford

Transport Across The Site And Effect On Existing Roads – Main document TRANS2 – Promoting Sustainable Transport p154 TRANS 4 – Transport Assessments p 158 TRANS 5 – Consideration of Development Proposals – p 159

Environment & Landscapes – **ENV 1_- Landscape and Countryside - p169, ENV 2- Biodiversity SSSIs p 171 ENV 4 Watercourses p 174 ENV 9 – Archaeology and**

Scheduled Monuments p 184, ENV 11 – Pollution p 187 ENV 12 – Pollution – Impact on Human Health p 188, EP 1 Air Quality, Health Impact Assessment P14 no detrimental effect on health of development!
p 189, **EP 4 - Flood Risk** p 192 and • **Strategic Flood Risk Assessment (December 2018) p66** Bayswater Brook site has 3rd highest flood risk after Grenoble Road and Culham.

DES 1 – Enhancing Local Character p 199 see Beckley & Stowood Character Assessment Wick Farm p20 - <https://beckley-and-stowood-pc.gov.uk/sites/default/files/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20Evidence%20Base%202%20Appendix%204-10.pdf>

COSTS- Infrastructure Delivery Plan – costs for infrastructure will be considerably in excess of £92.5 million. This sum is likely to be a gross under estimate of the true costs, much of which the developer is supposed to meet. This does not include 50% low cost housing. Additional costs yet to be included are – a reasonable estimate of the proposed road, a foot bridge over the ring road, services – sewerage water, electricity, gas etc