

# 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](mailto: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="Brian Gale"/>	<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="REDACTED"/>	<input type="text"/>
Address Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text" value="REDACTED"/>	<input type="text"/>
Postcode	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
Email Address	<input type="text" value="REDACTED"/>	<input type="text"/>

## 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:

Policy STRAT 13: Land North of Bayswater Brook

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.

**I do not consider the Local Plan to be legally compliant or sound based on the following reasons:**

### **Local Development scheme & timetable**

The LDS relevant to LP 2034 is not publicly available – only version on SODC's website refers only to the LP 2033. This is not compliant with NPPF guidelines. Furthermore Bayswater Farm (BF) was added to the Local Plan late in 2018 and did not have a site-specific assessment during the planning stage.

### **Consultation**

- Residents have not been informed or consulted about the plan, including types & density of housing.
- Vital questions have not been addressed to the City Council, e.g. opening of the cul de sacs at Burdell and Delbush Avenues.
- Due to the late addition of BF to the Local Plan, this site has not been through section 18 consultation.
- No consultation has taken place with the Sandhills parish council or residents before the plan was published on 7th January. This is non-compliant with the SODC's own Statement of Community Involvement (June 2017): "We wish to ensure that people are involved at the early stage of Local Plan preparation and in the consideration of planning applications. We want people to feel that they can make a real difference to the future of the areas in which they live and work."

## **National Policy & Legislation**

- The building of 160-200 houses at BF represents a 60% increase in housing. This goes against the NPPF (National Planning Policy Framework)
- The 3 reasons used by SODC for releasing Bayswater Farm from the Green Belt are flawed:
  1. Proximity to Oxford offers 'a high potential for travel by walking and cycling'. The SODC's own transport consultants say that "the A40 is a major physical barrier to connectivity, particularly in terms of walking and cycling.' BF is further on the outskirts than the rest of LNBB. Hence it's potential must be judged similar to the rejected Thornhill site – see below.
  2. Potential to connect to the city's public transport system. The Oxford City Council report, "Evaluation of Transport Impacts January 2019", shows that only 27% of journeys in South Oxfordshire are made by public transport or walking/cycling. A proposed release from the Green Belt for a development at Thornhill was rejected by the Council, although it has closer proximity to public transport than Sandhills.
  3. Building on BF is part of Oxford's unmet housing need strategy – not required, see below.

## **2. THE LOCAL PLAN IS NOT SOUND**

**It is not Positively Prepared:** No adequate flood risk assessment has been carried out for Bayswater Farm. The Local Plan states "More evidence on ecology is required". Also "appropriate detailed landscape, visual & heritage impact assessments must still be provided".

**Meeting the housing needs:** The Strategic Housing Market Assessment (SHMA) calculations for housing needs in Oxford are 22,775 new homes. The Local Plan includes 28,465 new homes, hence housing at Bayswater Farm is not required.

**Infrastructure:** There are no traffic solutions offered – only suggestions such as "a new road connecting to the A40" or "significant enhancements to junctions", e.g. the "Thornhill Park & Ride Junction". An Oxford City Council study estimates 250+ vehicles on Sandhill's roads at peak times due to the Bayswater Field site alone. However, thousands of cars could come through if Sandhills is connected to LNBB.

**It is not justified:** The development at Bayswater Farm is not required to meet the unmet housing needs of Oxford City; it would remove the only local amenity that Sandhills currently has – the green space which is vital for the wellbeing and health of residents.

## **3. THE LOCAL PLAN DOES NOT COMPLY WITH THE DUTY TO CO-OPERATE**

As set out in SODC's Statement Of Community Involvement they pledge to Cooperate with neighbouring local authorities such as Oxford city council. This has not taken place - this section of the LP should not be adopted.

## **4. OTHER CONCERNS**

Members of my family who live in Sandhills have young children. I have serious concerns as to what considerations, if any, have been given to:-

- Increasing levels of **traffic** and **pollution** significantly on access roads which are used by many primary and secondary aged children therefore jeopardising their personal safety further.
- Further pressure on both Sandhills Primary School capacity or other local primary / secondary **schools** and Oxford County Council Admissions to provide school spaces in, already, many oversubscribed local schools.
- An increased need for local **services** and **amenities**, of which there are none, on Sandhills.
- Reducing access to the countryside for all of which affects people's personal **wellbeing** and **mental health**.

(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.

### **Remove Bayswater Field from the proposed LNBB plan.**

If it is to be considered it must be assessed as a stand-alone site. A separate timetable and Local Development Scheme must be presented. A full consultation has to be conducted and adherence to National Policies & Legislation has to be made transparent, including the reasons for its removal from the Greenbelt. Furthermore, the plan has to be presented in a sound manner, positively prepared with all assessment results available. A justification provided for the housing need and clear plans presented how the infrastructure might be affected and which plans are in place to mitigate such risks.

(Continue on page 4 if necessary)

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

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:

16.2.19

**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](http://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.**

**Alternative formats of this form are available on request.** Please email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) or call 01235 422600 (Text phone users add 18001 before you dial).

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