

# 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:

<b>Title</b>	Mrs
<b>Full name</b>	Susanna Geddes
<b>Business / Organisation name (if relevant)</b>	-
<b>Job title (if relevant)</b>	-
<b>Address line 1</b>	██████████
<b>Address line 2</b>	██████████████████
<b>Address line 3</b>	-
<b>Postal town</b>	██████
<b>Postcode</b>	██████
<b>Telephone number</b>	██████████
<b>Email address</b>	██████████████████████████████

## 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:** SODC LOCAL PLAN 2034: STRAT 11 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.**

I wish to strongly oppose several of the Policy Strategies and Planning Policies in the SODC Local Plan 2034 on the basis that it not legal and not sound.

#### LEGALLY COMPLIANT

The SODC LP2034 is not legal because it has not been properly consulted on as it is significantly different to the earlier 2017 Local Plan. The 2017 Plan was abruptly changed in 2018 when there was a change of leadership in SODC and it is clear that the LP34 has been written in a hurry in order to meet Oxfordshire's Growth Board Deal timetable which is required to be submitted in March 2019 - hence the requirement to close the "response" period on 18th February. SODC's claim that having consulted on the 2017 Plan cannot carry weight under Regulation 18, as the two Plans have very different Policy Strategies, both for actual sites and for numbers of houses. The LP34 has not used the OAN criteria for housing correctly, nor have the NPPF, the Sustainability Assessment and the Duty to Cooperate requirements been fully adhered to (see Soundness). Therefore, SODC have not undertaken their Legal Compliance duties, certain Policies have not been Justified, and the LP34 should be rejected.

#### SOUNDNESS

The LP34 does not meet the criteria for "soundness" as defined by the NPPF 2018, namely;

1. It is not 'positively prepared'; 2. It is not 'justified'; 3. It is not 'effective'; and 4. It is not consistent with the NPPF.

The STRAT 6: GREEN BELT Policy needs to be completely re-examined. Six out of seven of the Strategic Sites are located in the Green Belt. This makes a mockery of NPPF guidance and central government statements on protecting the Green Belt in England. The NPPF states that "all other options need to be explored" – clearly this has not been done in the LP34.

As stated above, there is no justifiable housing need, therefore there are no special circumstances. The Grenoble Road site, in the SODC's own 2015 Report, has a high degree of amenity that is experienced by both residents and the approached to the city, and that no development should take place on this as site as it would constitute 'urban sprawl'.

#### STRAT.11 Grenoble Road

There are many conflicting and unsound statements in the background paragraphs 4.90 to 4.101 in the LP34 document. On one hand it is said in 4.92 to 4.95 that development on STRAT 11 will 'cause some harm' to the Green Belt, and then goes on to say in 4.96 to 4.101 that there are justifications for releasing the site for development, namely the 'special circumstances' to justify this. It has been shown above that to 'meet Oxford's unmet housing need' does not exist; the concentration of more traffic to a new Park& Ride will exacerbate traffic movement in local roads; the Sewage Farm smells are currently very bad and will be much worse with more housing and Science Park buildings (it is noted that SODC office staff recently asked to be moved from a building in the current Science Park because of the unacceptable smell and they were relocated in an office in Milton park) – people who buy houses will not be able to be relocated so easily, nor will future office workers or school pupils be similarly treated). The Science Park currently is underused, and many business are not 'science related', so it can be seen as more of a mixed use Business Park unsuited to a rural and edge of city location.

The Green Belt setting in this location (Grenoble Road) is hugely significant in that it meets the 'rural setting of Oxford in its landscape' and all the requirements of the NPPF paragraph 13. It has been shown that the suggested mitigation of 'special circumstances' is not met so the Green Belt must remain 'permanent'. A very important factor against development of this Strategic Site is that there are hugely important views from the Grade 1 Listed Park at Nuneham Courtney on the southern edge of the proposed development site. The view looking north towards the City encompasses the Grenoble road site and would be negatively impacted by new houses, other buildings and a Park & Ride facility. The study by 5th Studio on "edge intensification" has completely missed this Green Belt setting.

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.

POLICY H16: INFILL DEVELOPMENT. There is a need for a clearer statement to be made for infill development in relation to villages 'swept over by the Green Belt', and especially in relation to what constitutes 'brownfield development' in this context.

STRAT 1: Grenoble Road should be removed from the LP34, along with Northfield, Horspath, and North of Bayswater Brook.

STRAT 2 should take cognisance of the study by Opinion Research Services on Oxford City Objectively Assessed Needs, as mentioned in Soundness / Overall Strategy above. Oxford City has no OAN requirements.

STRAT 5: should have densities completely reviewed in the context of Green Belt locations.

STRAT 6: should be adjusted to remove references to STRAT 11, 12 and 13.

STRAT 11: should be removed from the LP34 altogether, as should STRAT 12 and STRAT 13.

TRANSPORT POLICIES: should be completely reviewed as they not legal and are unsound, as noted above.

Q10. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Q11. Would you like to comment on another policy or paragraph?

Yes

## Page 9: Part B - your comments

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:** Environment

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.

LOCAL AMENITY AND ENVIRONMENT: Sandford on Thames Parish is currently preparing its Neighbourhood Development Plan, and surveys of residents and visitors have shown that this category is highly regarded with the amenity of the countryside and the River Thames close to Oxford, Wheatley and the other surrounding villages. This contributes to the Wellbeing of residents and neighbours alike, it also has an important value in the natural environment in relation to Climate Change and the preservation of wildlife species. Growth must not be allowed to happen where all these factors are not considered properly in context and due regard to the planning system.

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.

More detailed local surveys and analysis is required for Environmental Assessments.

Q17. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Q18. 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