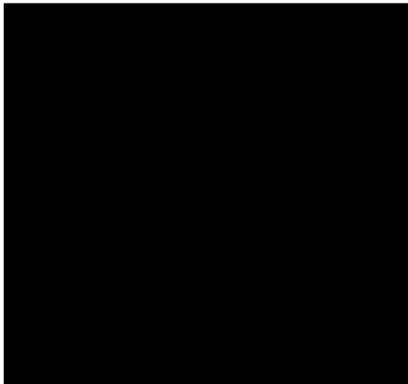


South Oxfordshire Local Plan 2034

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	Mrs
Full name	Barbara Gifford
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: Forward

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.

The first paragraph of the Foreword indicates that the strategic allocations of the Plan were reviewed due to uncertainty regarding deliverability. The primary reason for uncertainty was the deliverability of the Chalgrove Airfield site. Whilst the Plan has much to commend it, it is of concern to see that this site has been retained, whilst the uncertainty remains, and other sites which are clearly suitable and more readily available can be progressed more easily.

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.

Remove STRAT7 - Land at Chalgrove Airfield 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?

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: Neighbourhood Development Plans

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.

We support the concept of NDPs wholeheartedly. However, there are occasions where the Local Plan and the NDP come into direct conflict. Chalgrove Airfield is such an example; the NDP has delivered more homes than were needed to meet the requirements of a "Larger Village", and the NDP was commended by SODC for helping to preserve the scale, setting and character of the village. The Local Plan then proposes to merge a strategic site of 3000 houses with the village, thereby significantly affecting the scale, setting and character of the village.

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.

Delete STRAT7 Land at Chalgrove Airfield from the local plan

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

Page 11: Part B - your comments

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: Objective 1.4

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.

I support this objective; the Science Vale is at the heart of growth, innovation and productivity in South Oxfordshire, and development which supports the Science Vale and allows it to expand is welcomed.

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

Page 13: Part B - your comments

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 / Policy / Paragraph: Objective 4.1

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.

I support the provision of essential infrastructure to support existing residents and services, as well as growth. However, we believe that there should be a caveat that ensures that infrastructure investment is made where it will have the largest impact, rather than supporting strategic sites where the existing infrastructure is sufficient for the existing residents and businesses. Spend money where it will do the most good.

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: Policy STRAT 1 – The Overall Strategy - Clause 4.14

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.

I support the overall strategy of the Local Plan. We support the intention to focus development near to proposed employment growth. We also support the decision to locate strategic development that supports Oxford's unmet housing need close to the city in order to take advantage of existing infrastructure and opportunities for regeneration. Locations close to employment will help in reducing commuting distances and therefore improve sustainability of the developments. However, we do not support the inclusion of Chalgrove as a strategic site; STRAT 1 contradicts itself when it identifies Chalgrove as a strategic site, and then goes on to say "supporting and enhancing the roles of the larger villages, and lists Chalgrove again. Chalgrove should be removed from the list of strategic allocations.

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.

Delete STRAT7 Land at Chalgrove airfield from the local plan.

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

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: Policy STRAT2

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.

This Policy requires an annual building rate of 1270 homes per year, a figure that has never been achieved in the history of South Oxfordshire, and will require an infrastructure boost that has never been achieved in the history of South Oxfordshire. Whilst we support the intent of this strategy, the building rate seems excessively high, and may lead to the District losing their 5 year (or 3 year) land supply. The volume of houses required in STRAT2, 22,775 is based on an outdated 2014 SHMA, and should be recalculated using the current 2018 SHMA figures. The use of the old version of the SHMA is contrary to NPPF para 31, which refers to relevant market signals, and would be considered unsound under Paragraph 35a, as the plan is not based on proportionate evidence, but instead is based on outdated evidence.

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

Page 19: Part B - your comments

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: Policy STRAT4 - Strategic Development

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.

I support the aims of STRAT 4, particularly in regard to ensuring supporting infrastructure is provided in a timely manner.

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?

Yes

Page 21: Part B - your comments

Q54. 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: Policy STRAT6 - The Green Belt

Q55. 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	

Q56. 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.

Whilst I recognise the importance of the Green Belt, I am encouraged to see that South Oxford District Council intends to support Oxford's unmet housing need at sites that are adjacent to the city. I support the intention to provide housing within a reasonably commuting distance from the primary employment centres in the District. I also recognise that exceptional circumstances exist in that there are no alternative sites outside of the Green Belt that are appropriate for development.

Q59. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q60. Would you like to comment on another policy or paragraph?

Yes

Page 23: Part B - your comments

Q61. 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: Policy STRAT7 - Land at Chalgrove Airfield

Q62. 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	

Q63. 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 support Policy STRAT7 Land at Chalgrove Airfield, for a number of important reasons.

STRAT7 is contrary to SODC Objective 1.2, which refers to supporting rural communities, and their way of life, recognising that this is what attracts people to the district. Chalgrove has a Neighbourhood Plan which has been adopted, and was supported overwhelmingly at referendum. The Neighbourhood Plan has defined growth that is sustainable for Chalgrove, and the Strategic Site at Chalgrove runs counter to the aims of the Neighbourhood Plan, contrary to NPPF Paragraphs 12-14. The Neighbourhood Plan considers the Strategic Site in STRAT7 to have an adverse impact on the setting and character of the existing village.

STRAT7 is contrary to SODC Objective 1.3, which refers to "sustainable" places to live and work. Sustainability has many factors, but NPF Paragraph 8a defines sustainable development as ensuring that sufficient land is available in the right places to support growth, innovation and improved productivity. The growth in the region is centred on Oxford City and the towns, primarily Didcot, but also

Abingdon and Thame. There is no growth requirement in Chalgrove, which is a self-sustaining large village which currently has sufficient infrastructure to support the needs of residents. There is little opportunity to promote improved productivity in an area which is highly rural.

STRAT7 is contrary to SODC Objective 3.2, which seeks to reduce commuting distances by supporting business growth in locations close to existing business areas. Chalgrove does have a small business park, but this caters primarily for micro-businesses, and is not a large-scale employer in the area. The majority of residents in Chalgrove of working age commute to Oxford, Didcot, Thame, Wallingford, Henley, Reading, High Wycombe, Bicester and London. Business growth in a highly rural setting will not attract businesses due to the remoteness of the location, whereas other sites within the plan are close to the centres of business growth, and benefit from existing infrastructure and sustainable transport options. NPPF Paragraph 80 refers to driving innovation; this is primarily in the Science Vale and not in the rural villages. NPPF Paragraph 83 does refer to rural areas, and sustainable growth. The proposed strategic site does not provide sustainable growth in this rural area.

STRAT7 is recognised in SODC Objective 3.3; the opportunities for sustainable journeys to work are virtually non-existent in Chalgrove. Increased bus services to Oxford as proposed would address a small percentage of the journeys undertaken by existing residents, and there is no infrastructure plan that addresses access to major employers in the area, such as the John Radcliffe Hospital. NPPF 102e states that the environmental impacts of traffic should be identified, assessed and taken into account, including opportunities for net environmental gains. Increased population density in a remote rural location will not offer these opportunities.

STRAT7 does not support SODC Objective 3.5; world-renowned and cutting edge industries will be drawn to the Science Vale, rather than an isolated rural site.

STRAT7 is contrary to SODC Objective 4.2, to make sustainable transport, walking and cycling a viable choice for people. Chalgrove is a remote site with very limited road infrastructure. The infrastructure plans identified are insufficient for sustainable transport, as the road system is neither safe nor conducive to cycling or walking except within the confines of the development, and distances to employment centres are prohibitive. There is a significant risk of Chalgrove becoming a car-based settlement, as public transport is extremely minimal, and proposed public transport improvements would be wholly inadequate. Sustainable transport schemes limited to additional bus services are proposed, but cannot be funded by the County Council. The site is served by a single B-road, the B480. This is contrary to NPPF paragraph 8c, 102c, 104b, 104d, 108a, 108b, 108c, 110a, 110d.

STRAT7 is contrary to SODC Objective 5.2, which seeks to support development that respects the scale and character of our towns and villages. STRAT7 during the plan period will triple the size of the existing community, and beyond the plan period will almost quadruple it, and there would be significant negative effects for the existing community. The Strategic Site Selection document makes reference to "regeneration" of Chalgrove; this is not a requirement that is recognised by the community. This strategy is contrary to NPPF Paragraphs 12-14.

STRAT7 is contrary to SODC Objective 6.1, which champions Neighbourhood Planning. The Neighbourhood Plan has identified growth of almost 30% (in excess of the 15% required by the local plan for larger villages) which totals 320 houses that will meet the needs of the community, and represents a sustainable increase in housing. This strategy is contrary to NPPF Paragraphs 12-14

STRAT7 is contrary to SODC Objective 7.2, to conserve and enhance historic assets. The proposed strategic site will be adjacent to a registered historic battlefield; development on this scale will be detrimental to the setting of this area. This is contrary to NPPF Paragraph 28

STRAT7 is contrary to SODC Objective 8.2, which seeks to "minimise carbon emissions and other pollution such as water, air, noise and light, and increase our resilience to the likely impact of climate change, especially flooding". Due to the location of Chalgrove in a remote, rural area of South Oxfordshire, carbon emissions will necessarily be higher than for sites closer to the major employment centres and with access to existing public transport infrastructure. Chalgrove has no rail service, and is not near any rail lines. All transport from Chalgrove will, of necessity, be car-based, and deliveries of goods and services will also have increased journey distances. This is contrary to NPPF paragraph 8c, 102c, 104b, 104d, 108a, 108b, 108c, 110a, 110d.

Land at Chalgrove Airfield Para 4.61 states the Chalgrove Airfield is 11 miles east of central Oxford; this is incorrect; it is over 13 miles to the centre of Oxford. It also states that the Airfield is 5 miles from the M40 Junction 7; it is actually 6.5 miles. Errors of between 15 and 30% in terms of distance should be corrected; SODC were advised of the correct distances in previous consultations. This is contrary to the NPPF definition of Local Plan, where the local planning authority consults with the community.

Land at Chalgrove Airfield Para 4.62 and STRAT7 2(i) state that land will be safeguarded for the future operations of Martin-Baker Aircraft Company Ltd. The proposal is to build housing, schools and limited employment centres adjacent to an active runway, which will require extensive and as-yet unidentified mitigation methods to address public safety considerations. In addition, Martin-Baker operates a pyrotechnic test facility at the Airfield, which carries out regular explosives testing. This would also be adjacent to proposed housing. It is inconceivable that sufficient mitigation could be implemented to prevent significant noise nuisance to new residents on this site. A site with significant noise pollution at the heart of it is contrary to NPPF paragraph 91c and 95a. The proposal to allow Martin-Baker to remain on site must also be mindful of NPPF paragraph 95b; Martin-Baker is a major defence contractor, and as such, would be adversely affected by the impact of proposed development on a site they currently enjoy full use of.

Land at Chalgrove Airfield Para 4.63 states that disposal of the Airfield by the MoD would not have taken place if operations at Benson were impacted. We have written evidence from the Station Commander at RAF Benson that the loss of use of Chalgrove Airfield would cause disruption to the training of aircrews flying Puma and Chinook helicopters.

Land at Chalgrove Airfield Para 4.64 states that Homes England will continue to try to work with the leaseholder. The leaseholder, Martin-Baker, advised Homes England in December 2017 that their plans had been rejected by the Board of Directors, and that no further correspondence would be considered. Further – Martin-Baker have written to SODC and Homes England, setting out in detail how they use the Airfield, and how any development on the site would compromise their operational activity. They have also provided diagrams of the site, showing that the danger zones for their testing overlap the housing areas. This is contrary to NPPF paragraph 95 and the Glossary entry on "Major hazard sites, installations and pipelines"

Land at Chalgrove Airfield Paragraphs 4.64 and 4.65 identify an issue with the existing tenant, and the requirement for a Compulsory Purchase Order. As a result, Paragraph 4.65 indicates that no completions are expected on the site until 2026/2027 at the earliest. This is contrary to NPPF paragraph 67a, which stated that the policies should identify a supply of specific, deliverable sites for years one to five of the local plan period. SODC's own definition of Deliverability also defines the ability of the site to deliver housing within five years. This site breaches that definition.

STRAT7 Item 2 (i) states that a re-aligned runway will be designed in line with CAA standards. Martin-Baker have already advised SODC and Homes England, in writing, that the proposed re-aligned runway will not be long enough. There is insufficient space for the length of runway required in the reduced operating area.

STRAT 7 2(ix) states that necessary infrastructure must be provided. Currently, very few areas of land have been secured for the proposed highway infrastructure projects, and one of the proposed bypasses is located almost entirely in Flood Zone 3b, on the River Thames flood plain. The road improvements proposed will open a new corridor between the M40 and Oxford that will allow traffic to avoid the M40, A40 and A34, significantly increasing road traffic in an unsustainable way. This is contrary to NPPF paragraph 103.

STRAT7 2(ix)(a) proposes to re-align the Chalgrove bypass through the centre of the new development. This removes the bypass from the village, and will run it through a new main street. This is the exact opposite of the proposals in STRAT7(ix)(b), to provide bypasses or edge roads for the surrounding villages. Paragraph 4.67 identifies an AQMA in Watlington, and monitoring in Stadhampton. Both of these are proposed to have bypasses/edge roads to improve air quality. The diversion of traffic from a bypass through the centre of a development will inevitably increase the levels of traffic-based pollutants. This is contrary to NPPF Para 103 and 180/181

STRAT7 2(ix)(c) proposes improvements in bus routes. This is the only proposed sustainable transport option, and is limited to destinations used a small percentage of Chalgrove's current commuters. There are no plans to provide services to local towns such as Thame, Wallingford, Henley or the wider district. This is contrary to NPPF paragraph 103 and 104.

STRAT7 2(xii) proposes mitigation of potential impact on residential amenity associated with continued use of part of the site as an airfield. This does not address the issue of the explosives testing facility on the site. There are no possible mitigations to sirens and explosions adjacent to residents. There are no possible mitigations to low altitude ejection seat tests from jet aircraft over the Airfield. The safety aspects of building adjacent to the airfield have been completely ignored. This is contrary to NPPF paragraph 95 and the Glossary entry on "Major hazard sites, installations and pipelines"

STRAT7 4 refers to the deliverability of the site. The plan previously identified that there is uncertainty about the Chalgrove site coming forward, given that the site would require a CPO. There are a number of factors which would indicate that the success of a CPO would be unlikely, as in order for it to

succeed, it would need to prove necessity and public interest. The Local Plan significantly over-provides housing for the plan period; in STRAT2 it identifies 22775 houses, but in Paragraph 5.11 it identifies a total of 28,465 houses within the plan period. This overprovision of 5,690 houses means that if the entire Chalgrove site were removed from the plan, there would still be an over provision for the plan period which removes the argument of necessity completely.

STRAT7 4 refers to the timing of housing delivery. The SODC definition of deliverability in the Local Plan Glossary matches part of the NPPF definition – that sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Because of the issues with the current tenant, there is a question as to the availability of the site – the site would not be available until the outcome of the CPO is known. The location, as described above, is a highly rural and remote part of South Oxfordshire, and under the definitions of the NPPF cannot be considered suitable for a strategic development. Finally, the Local Plan itself does not consider that any completions will occur until 2026/27 at the earliest, which is outside of the five year period specified. For all of these reasons, the Chalgrove Airfield site fails the NPPF definition of deliverability.

Q66. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q67. 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