

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="Mark Gilbert-Smith"/>	<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"/>	<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"/>	<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:

STRAT 9

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.

Current Government policy provides protection of the Green Belt at the highest level. Evidence of this is set out further in the National Planning Policy Framework (July 2018) specifically in 'Protecting Green Belt'.

Under this guidance the Boundaries to Green Belt can only be changed if there are 'exceptional circumstances', 'fully evidenced and justified' and 'as a last resort'.

The proposed local plan to be adopted promotes altering the Green Belt in 6 out of the 7 identified strategic sites. This comprises 11,400 houses in the Green Belt. The largest of these being at Culham, where a new town of 3,500 houses is proposed. STRAT 9 doesn't propose to amend the boundary, but to erase it completely.

In my view there are 'no exceptional circumstances' given there are other more suitable brownfield sites, the policies are contradictory and the evidence base lacks detailed analysis and research on what the actual housing demand is within SODC and neighbouring Oxford City.

The plan has not cooperated with the Culham Parish council, or Abingdon Town Council and the plan even goes on to say there is significant uncertainty regarding the precise level of houses required for Oxford City.

I understand from local representatives that the plan was debated by local councillors prior to the Christmas holidays and it was very hostile and that it was not a fair debate nor had the full attention of the leader. On a similar vein asking for people to respond in the middle of school half term, knowing that many people are busy or away with family is underhand.

(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.

Yet again the whole plan is unsound and is contradictory with inconsistencies on housing levels required. The proposed local plan is misleading in the number of houses proposed at Culham.

Given all of the above we do not believe it has been clearly thought through. The modifications made since our last representation in October 2017 have not been taken into account and therefore it is apparent that further modifications are not the solution. I ask that Strat 9 is removed from the plan until due consideration and certainty on housing numbers is clarified.

(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:

14/02/2019

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.**

STRAT 9

The proposed 3,500 homes in Culham is currently agricultural land and forms part of the Green Belt. There are no extraordinary reasons to remove Culham, or the proposed site, from the Green Belt. The Green Belt is in place to protect towns of special character (Abingdon) and villages (Culham, Clifton Hampden) from merging into one and to protect the countryside. The proposal contradicts the latest National Policy and Housing White Paper. The land is not 'suburban in nature' as quoted in the consultation plan, and at present safeguards the character of Abingdon town, local villages, the countryside and should continue to enjoy protection as Green Belt, with the agricultural land to be preserved and enjoyed for the community and future generations.

There is insufficient robust and credible evidence and some of the evidence is deeply flawed and contains incorrect data.

Culham villagers have had insufficient involvement and consultation and therefore Save Culham Green Belt considers SODC has failed in its duty to cooperate with Culham and with the neighbouring Parish Council at Clifton Hampden; and with the historic town of Abingdon which is across the District boundary and is largely ignored in most of the *South Oxfordshire Local Plan*.

One example of this was the recent publication of the Councils newspaper Outlook, which gave little coverage to this important topic. This is just another example of the councils underhand tactics.

In addition to the loss of Green Belt I strongly object to the proposed 3,500 new homes to be built in the Green Belt at Culham. Culham is not listed as a Large village within the local plan and falls within the 'Smaller villages' classification. Policy H10 states that a minimum of 500 new homes will be delivered across all of the smaller villages. The 3,500 proposed at Culham is 7x this suggested minimum target across all Smaller Villages and therefore contradicts the plan.

With a projected 8,000-10,000 inhabitants on the site the propose scheme will swell the local population of 450 more than 20 times and will materially impact upon the local environment, infrastructure and population. In contrast the site proposed at Didcot A proposes 270 homes on a 9.5 ha site, this is a much lower density, given its proximity to Didcot and an already established infrastructure (road and rail). The proposed development therefore is of an inappropriate size and scale.

I am not adverse to redevelopment however prior to any development and in conjunction with the redevelopment of the employment land at Culham Science Park a new river crossing is essential. The river crossing should come first, as opposed to the housing, it's not just the inhabitants but the increase of construction traffic during the development period will also have a significant impact on the local network. The current road network and junctions to A415 cannot cope, with the local roads being gridlocked at peak times. I would support either of the proposed routes running north-south. Can the council confirm that funding is in place, if not, who is going to pay for this?

Any proposal should be well planned, unlike Great Western Park, and have mixed housing, not just affordable housing but also larger family houses as one would typically find in any traditional village. Consideration should also be given to apartments with decent floor plates, parking and outdoor space which would assist in density but would also help younger people get onto the housing ladder. Any development should be set back from the road, to give it its own identity and make it a more attractive place to live and to lessen the chance of any future ribbon development.

A smaller scheme would ensure the Green Belt is not reduced and account for a considerable number of new homes within the wider plan whilst ensuring that the large fields leading up to the European School are left untouched and thus ensuring that a ribbon development does not occur and would preserve part of the green belt. There are other alternative more viable sites being promoted by others which have previously been rejected a suitable sites for larger schemes. These should be reconsidered as more viable sites within the Consultation Plan. A selection of these are;

- Infilling the Wallingford Ring Road
- Mongewell Park
- Grenoble Road site (Kassam Stadium)
- Harrington New Settlement (Junction 7, M40)

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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