

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	Dr
Full name	Eliane Glaser
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: Policy STRAT13: Land North of Bayswater Brook

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.

In the previous local plan (2033), SODC assessed but rejected Lower Elsfield and Wick Farm as possible places to build houses. Now, for the first time, it is linking these two sites and calling them, Land North of Bayswater Brook in Local Plan 2034.

Before selecting a new strategic allocation (building 500+ houses) the council is required by national planning guidelines to carry out up to date, site-specific and detailed assessments of impacts from the site's development on transport, air quality, human health, biodiversity, flood risk, trees, landscape, views, heritage and archaeology. This is different to a private developer who is applying for planning permission.

- SODC has not done these required assessments.

- SODC intends instead to postpone most of these appraisals to the planning application stage, and make the developer conduct them: they cannot be counted upon to be impartial or objective.

The council's approach to assessments about this site does not comply with NPPF para 170:

'Planning policies and decisions should contribute to and enhance the natural and local environment.'

And it is SODC not the developer who should assess the potential impacts of development on the natural and local environment in order to 'prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.'

Here are just some of the important assessments that SODC failed to carry out.

1. Transport impacts:

Oxfordshire County Council warned SODC that development at this site will boost congestion on the nearby road network: it forecasts that increased traffic is 'likely to result in increased congestion along the links leading to the A40. There is also a forecast increase to network stress at the Headington Green Road Roundabout.'

The county council wants the developer to put a through road in the site to connect the Elsfield Lane (going to Marston Junction) and Bayswater Road (going to Headington Roundabout). Furthermore to relieve pressure on the Headington Roundabout, the county council wants a link road more or less from the site (on land east of Bayswater Road) to somewhere on the A40.

Sustainable Transport (walking, cycling, rail and bus): The County Council and SODC admit that even though LNBB is relatively close to the city, 'the A40 is a major physical barrier to connectivity, particularly in terms of walking and cycling.' They have not published any ideas about how to overcome those barriers apart from making the developer build a bridge from somewhere in the site over the Bayswater Brook and the A40 to somewhere in Northway. The last sustainable transport study in 2017 did not assess any of the new strategic allocations that the council wants to put in the Green Belt (LNBB, Northfields, South of Grenoble Road).

2. Biodiversity:

The last biodiversity assessment that SODC did was in 2010 for sites near Didcot, Henley and Thame. It has done nothing about the new sites that it proposes for development in the Oxford Green Belt. SODC's ecology experts recommended: "Do not allocate site without a detailed assessment of the potential impacts of the allocation on Sidlings Copse and College Pond SSSI". The Council ignored the recommendation and allocated LNBB without a detailed appraisal of the harm to biodiversity across the area and to the SSSI.

3. Air Quality:

SODC recognises that increased housing and development on the edge of Oxford, will contribute to air quality problems nearby: the whole of Oxford is in an Air Quality Management Area and therefore SODC has to consider measures to mitigate air quality impacts from the new development.

At plan-making stage (during 2018) SODC should have assessed the potential impacts from increased car emissions and household emissions in the proposed site on the surrounding area (including the SSSIs). Instead it proposes to postpone these to planning application stage and put the burden on the developer to produce them- they cannot be counted on to produce an impartial objective report. That is non-compliant with NPPF para 170 mentioned above.

4. Flood risk:

The Sustainability Appraisal recommended that SODC conduct a site specific strategic flood risk assessment (SFRA) before promoting either Wick Farm or Lower Elsfield for housing: this was not done because it rejected both sites. The Strategic Flood Risk Assessment recommended that a site specific flood risk study be done for LNBB. A small section of the old Wick Farm site has been included in the new site, Bayswater Farm north of Sandhills: there has never been any specific study of flood risk there.

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.

I would like the Land North of Bayswater Brook (LNBB) (This includes land in Elsfield Parish) out of the local plan because South Oxfordshire's District Council's (SODC) strategy for Land North of Bayswater Brook is unsound and inconsistent with national planning guidelines.

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?

No