

South Oxfordshire Local Plan 2034

Page 3: Part A - contact details

Q1. Are you responding as an:

Business / Organisation

Page 6: Business / organisation contact details

Q4. Due to the plan-making process including an independent examination, a name and means of contact is required for your comments to be considered:

Business / organisation name Gresswell Environment Trust
Contact name Nicola Mallows
Address line 1 College House
Address line 2 Stanton St John
Address line 3 -
Postal town Oxford
Postcode OX33 1HE
Telephone number -
Email address [REDACTED]

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: Strat 1

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.

Strat 1

Unsound: inconsistent with national policy as set out in the NPPF

- This is a totally new SODC Local plan, as opposed to a revised version of 2033 Local Plan. It violates section 18, having failed to be presented properly, according to the proper consultation process. It is therefore legally questionable and unsound.
- It has not allowed sufficient time for proper consultation on crucial strategies, in particular a total change of SODC policy in regard to building on the Oxford Green Belt. This is contrary to the NPPF.
- This new plan is a response to the Growth Board's deal (£215m) toward nominal infrastructure for Oxford, with OxLEP's greedy economic conjecture: a political diktat rolled out over South Oxfordshire by Oxford City Council, with no regard for local opinion or residents both inside and outside Oxford: Oxford City Council trying to mastermind a land grab on Oxford's Green Belt for a so-called unmet housing 'need', when in reality none exists.
- Oxford trying to develop all its brownfield sites into businesses (as opposed to housing). Oxford chooses not to build houses. Instead it is pushing its conjectural housing need onto SODC under the duty to cooperate. SODC is effectively being bullied by Oxford City Council to provide housing 'solutions' for Oxford on the Green Belt: a blatant land grab that will result in the wrong sort of developer led houses in the wrong places, mainly for incomers, and potentially for commuting to London.
- The NPPF stipulates that Green Belt land should be kept open in order to curb urban sprawl and keep settlements separate. The health and wellbeing of the town or city is at stake: edge of city sprawl is not in Oxford's interests. Much of the planned housing will be of the wrong sort: developer led, profit driven, aimed at incomers, no provision of key worker housing (or relieving/ replacing the poorer housing stock). Oxford should relinquish all its brownfield sites for housing, to combine business and residential, before imposing houses 'out of town' onto the Oxford Green Belt, onto SODC land.
- Housing figures based on SHMA, in themselves questionable, have now been increased beyond all reason by Growth Board deals with SODC, Cherwell and Oxford City, housing that is far in excess of what was agreed for 2026 Local Plan. The methodology of assessing numbers is questionable, and keeps changing. First SHMA 2014, then the SODC Local Plan to 2026, and now this 2034 local plan - figures far in excess of what is 'needed'.
- These development proposals in no way reflect local demographic need.
- Oxford City does not have a housing need, only a 'so-called' housing need based on Oxford's wishful thinking. If Oxford were to develop its own brownfield sites into housing for key workers as opposed to yet more businesses, or mixed business and residential, Oxford would have no need for edge of town housing: a serious threat to the Oxford Green Belt.
- The GBelt is one of the most admiral planning success stories of the past 50 years. Every proposal to build houses on the Oxford Green Belt makes this plan contrary to Government Policy (as laid out in the NPPF) and therefore fundamentally unsound
- To argue that close proximity to Oxford is sustainable, on an assumption of increased employment opportunity is a nonsense. Most of these 'edge of city' proposals have no existing infrastructure or transport links into town, and will end up as car dependent. They will not benefit existing locals, are aimed at incomers, and will only add to the pressure of traffic, pollution, and services
- There is no guarantee that any of the proposed houses will be the right houses in the right places for the right people. Development led housing in itself produces formulaic housing that does nothing to answer demographic need. Oxford already has an overload of people trying to get to the center of town for work, it does not need more, it can barely deal with what it has.
- Oxford has a population of 154,000. It cannot sustain a doubling in population.
- At present it has a workforce of 45,000 – commuting into the center, and Hospitals. It cannot manage more traffic, or people.
- Oxford's geographical layout and natural features cannot sustain an increase on the scale that is planned by the Growth Board. This is irresponsible, un-joined up greedy speculative thinking that will ruin an Historic National Asset.

- Oxford will become unworkable and therefore unsustainable.
- Oxford should provide for its own housing, and SODC should concentrate on developing its own economic opportunities with associated housing away from the Green Belt. Developer led housing for incomers and commuters is not a reason to sacrifice the Green Belt.

housing, to combine business and residential, before imposing houses 'out of town' onto the Oxford Green Belt, onto SODC land.

- Housing figures based on SHMA, in themselves questionable, have now been increased beyond all reason by Growth Board deals with SODC , Cherwell and Oxford City, housing that is far in excess of what was agreed for 2026 Local Plan. The methodology of assessing numbers is questionable, and keeps changing. First SHMA 2014, then the SODC Local Plan to 2026, and now this 2034 local plan - figures far in excess of what is 'needed'.
- These development proposals in no way reflect local demographic need.
- Oxford City does not have a housing need, only a 'so-called' housing need based on Oxford's wishful thinking. If Oxford were to develop its own brownfield sites into housing for key workers as opposed to yet more businesses, or mixed business and residential, Oxford would have no need for edge of town housing: a serious threat to the Oxford Green Belt.
- The GBelt is one of the most admiral planning success stories of the past 50 years. Every proposal to build houses on the Oxford Green Belt makes this plan contrary to Government Policy (as laid out in the NPPF) and therefore fundamentally unsound
- To argue that close proximity to Oxford is sustainable, on an assumption of increased employment opportunity is a nonsense. Most of these 'edge of city' proposals have no existing infrastructure or transport links into town, and will end up as car dependent. They will not benefit existing locals, are aimed at incomers, and will only add to the pressure of traffic, pollution, and services
- There is no guarantee that any of the proposed houses will be the right houses in the right places for the right people. Development led housing in itself produces formulaic housing that does nothing to answer demographic need. Oxford already has an overload of people trying to get to the center of town for work, it does not need more, it can barely deal with what it has.
- Oxford has a population of 154,000. It cannot sustain a doubling in population.
- At present it has a workforce of 45,000 – commuting into the center, and Hospitals. It cannot manage more traffic, or people.
- Oxford's geographical layout and natural features cannot sustain an increase on the scale that is planned by the Growth Board. This is

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

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: Strat 2

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 Cooperate?			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.

Strat 2

Unsound.

Not consistent with national policy: Brownfield for housing every time.

- Oxford should develop its own brownfield sites before having aspirations to build on the Green Belt with inappropriate edge of town developer led housing. Brownfield first everytime.
- The most sustainable answer to Oxford's so called unmet housing need is to build appropriate housing for key workers within the City, close to centers of employment, close to local amenities, NOT on the Green Belt.
- The housing requirement figures have now increased to an impossible and ruinous 17,825 to 2034, with no justification or vision other than to develop Oxford into a business hub at any cost, irrespective of Oxford's historic importance as a cultural and university city.
- Oxford City Council is acting irresponsibly, against local peoples' wishes (so much for Localism)s Oxford City's own Local Plan is thoroughly greedy, and irresponsible, showing no respect for local opinion, or demographic need. Oxford now expects SODC to pick up its housing quota under the duty to cooperate. Neither Oxford nor SODC residents want this. It is completely inappropriate to gamble away Oxford's Green Belt in pursuance of conjectural economic growth.
- If none of these houses were built - would anyone suffer?

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

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: Strat4

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.

Strat 4

Unsound

- Poorly assessed, not properly consulted upon, no EIA on flood plain or SSSI Sidlings copse.
- The Oxford Green Belt is of National Heritage importance. It helps preserve, and keep open important views from Oxford itself, and down onto Oxford: eg Cowley to over dreaming spires to Boars Hill , green fields beyond; from Marston and Headington toward Elsfield and Sidlings Copse out over open agricultural land; from Barton across to Shepherds Pit; from Garsington over Oxford; from Shotover into Headington: all Visual Amenities, views over Oxford from one side to the other; views that delight, views that give Oxford its context and preserve its scale, as important to Oxford residents as to those passing through on the A40 or A34, and to those living in the outlying villages. The Green Belt keeps Oxford contained and in scale with itself.
- Oxford should lie within its natural historic landscape, not sprawl out over ring roads onto open agricultural land. Urban brownfield sites every time.
- Many of the proposed sites will affect the Oxford water table.. They are therefore unsuitable for development because they are on, or close to the Oxford flood plain.
- Building on the Green Belt would affect the Visual and Landscape Amenity offered to local city and rural residents. Oxford is a major national cultural and architectural and living asset. No provisions has been made for any of the main infrastructure or problems that will arise form increased traffic –
- 17825 houses are likely to mean a minimum of 30,000 extra cars. Oxford already has a traffic problem and a poor air quality record – it doesn't need more cars. Close proximity to rail links and non car transport hubs would be preferable to edge of town development that will inevitably rely on cars. Cars should be reduced not increased.

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: Strat 5

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.

Strat 5

Sound.
Residential Densities,

- Land is NOT a renewable resource or a commodity. It should be used sparingly. Once built on land is lost forever.
- SODC already has a surfeit of low-density executive style housing: it does not need more. Oxford 's only 'need' is demographic, for housing for key workers, who anyway would be better provided for by urban amenity housing, closer to centers of employment.
- Close to employment, and with good urban amenities, Brownfield every time.
- Urban densities can be much higher than rural or commuter housing,
- therefore urban development is the most sustainable option.

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: Strat 6

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.

Strat 6 Green Belt

Unsound

- The Green Belt is fundamental to Oxford's success: it is its life-blood and lungs, important both to Oxford residents and outlying villages in order for keep settlements separate, and apart. Building on the Green Belt is not compliant nor consistent with the NPPF.
- It is inappropriate to release Green Belt land in order to satisfy Oxford's so called unmet housing need. Oxford City's economic attitude and greed toward developing all its brownfield sites for business use over residential is inappropriate and irresponsible, and contrary to the NPPF
- Visual amenity is one of the 5 principles of the Green Belt.(Strat 13) as is curbing urban sprawl. The Green Belt is there for a purpose.
- Notional unmet housing need does not constitute exceptional circumstances. Building on the Green Belt cannot therefore be justified.
- Land all around Oxford is Green Belt. This should be enough protection against development under the NPPF. However the new SODC Local Plan 2034 seems to allude a new category of land preservation ENV2 – showing all land around Elsfield and Beckley/ Stanton St John over Menmarsh as having added protection under landscape conservation. Land south of the B4027 toward Oxford/ Shepherds Pit is not marked ENV2. This is very worrying for Stanton St John in terms of keeping the village rural and separate from Oxford/ Barton/ Bayswater. Does this mean that SODC has done a U-turn on this land so that it is now up for long term 'scoping for development.? This is contrary to all previous years, where SODC has vehemently opposed all development between SSJohn and the A40. (Rectory Farm relocation 2000, and the Gresswell Environment Trust field (bought 2004 in order to protect it against inappropriate development)

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

Page 17: Part B - your comments

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: Strat 12

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.

Strat 12 Northfield

Unsound

Horspath and Garsington should not become suburbs of Oxford. They are rural outlying villages, and under the NPPF should principally remain separate sustainable communities, apart from Oxford. There are no sustainable transport links or economic reasons to develop this land. It is edge of city, inappropriate, likely to be come car dependent, and /or commuter centric. Close proximity to the Ox Camb Expressway is not a sustainable reason to sacrifice the Oxford Green Belt.

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: Strat 13

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.

Strat 13

Land North of Bayswater Brook (LNBB)

Unsound and unsustainable.

Unlikely to be deliverable

- This site was not included in the Section 18 of the previous SODC Local Plan, therefore it is unsound to proceed with as `Section 19 consultation: a rush job, legally questionable.
- The plan is based on out of date housing need assessment (SHMA 2014, as opposed to SHMA 2018) - an over exaggeration of housing numbers.
- It is inappropriate to build 1100 houses on 'open' uprising Green Belt land. This land is an important visual amenity and landscape resource as seen from Old Headington and Barton, and from SSSI Sidlings Copse and village of Elsfield toward Oxford.
- Its northern boundary shows little or no respect for the SSSI Sidlings Copse, which inevitably would suffer from footfall and erosion were land around it to be developed. There is no natural boundary other than a barbed wire fence.
- There is no National Imperative that states houses are more important than SSSI (BBWONT Sidlings Copse). Oxford's so called unmet housing need is not exceptional enough to ruin a natural historic habitat and ancient woodland.
- It is inappropriate under GBelt policy to build beyond the natural boundary of Bayswater Brook. The land is wet, and is a vital sponge before the low-lying flood plain land below. Were it to be developed it would force water further downstream onto the already floodable Woodeaton and Elsfield junction, and further down stream toward Marston and Oxford.
- Wick Farm is brownfield, with ancient monument Holy well. 'Land North of Bayswater ' is inappropriate for development being open agricultural Green Belt. It should remain open on the principles of Green Belt NPPF: and for visual and local amenity.

- The site is unsustainable, having no direct road access other than through Barton on to the Bayswater Road, no natural access toward Oxford except via the bottom of Elsfield Road. WQoodeaton/ Elsfield junction floods regularly. It has standstill traffic commuting into Oxford in the mornings.
- A link road to the A40 implies incomers who will be commute into London. There is no costing for this road, and this makes the site unsustainable, un-commercial, and potentially undeliverable.
- Para iii) An A40 link road would damage the Green Belt further, would quickly become a rat run onto the A40/ M40. It would ring fence the houses and Oxford Crematorium. It would blight the surrounding area and outlying villages, such as Beckley, Stanton St John with traffic noise and air pollution.
- There is no guarantee that any of the proposed houses will be the right sort of houses for Oxford. ie affordable, for key workers: the economics don't stack up. The density of 1100 implies executive, commuter housing for which there absolutely is no 'need'. Developers have a habit of building high spec low density 4-5 bed houses for maximum profit unless forced to do otherwise.
- The field toward Sandhills behind Bayswater Farm is an important local recreational amenity used by Barton and Sandhill residents alike, joining local communities. It is Green Belt. It should not be become an housing infill land-grab by Oxford City.

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?

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