

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	Ms
Full name	Jessie Grimond
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: 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.

The plan exceeds known demand in the area hugely - to the extent that the quantity of building would totally change the character of this rural area. The plan envisages 40% more houses than there are currently in the whole of SODC, a huge change that is unnecessary in scale. The infrastructure could not cope with this, and transforming the area to this extent would violate the council's duty of care to the existing community.

The plan states that it should be consistent with the strategy of "protecting and enhancing the countryside and particularly those areas within the two AONB and Oxford Green Belt by ensuring that outside of the towns and villages any change relates to very specific needs such as those of the agricultural industry or enhancement of the environment." But the new Local Plan would in no way protect or enhance the countryside, the AONB or the Green Belt because the quantity of new housing, the scale of development envisaged would demand such significant concreting over, increased traffic, and pressure on current infrastructure. The area around Nettlebed, for instance, within the AONB, does not have proven agricultural industry needs and it is unclear what "specific needs to enhance the environment" it envisages, yet the village has been marked for 46 new homes. The effect on the area would be significant and the pressure on services and the environment intense; the need has not been satisfactorily demonstrated.

It is hard to avoid the suspicion that the real driver behind this plan for this scale of new building is in fact - as stated on page 35 - the Council's desire to fill its own coffers with the government's promised funding of £2,151 per house through the Oxfordshire Housing and Growth deal and not to respond to the actual needs of the area. Our environment and services are in danger of being hocked for government grant money.

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.

The existing 2026 Local Plan delivers the district's actual housing need so there is no public benefit in this new plan. In fact there is significant public detriment in overpopulating and suburbanising an area that is rural in character.

Any plan for South Oxfordshire should seek to deliver the number of houses that are needed - 10,000 according to the official government forecast, at prices that are affordable to the people who wish to live in the area.

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 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.

Please see response to STRAT 1 expressing my view that the plan does not respond to the actual housing need of the area.

This plan is based on identified housing need figures put forward in the 2014 SHMA for Oxford. However, the SHMA has been discredited and the new official government calculation, based on Henley MP John Howell's work, puts Oxford's actual need at half the SHMA forecast: 15,000. This is endorsed by the new GL Hearn (original authors of the SHMA) study which says that See response to STRAT1 on previous page.

The area's need has been significantly overstated.
Oxford's need has been significantly overstated.

Oxford's own local plan has not even been examined by a Planning Inspector - so there is no reliable calculation of Oxford's 'unmet need'. Oxford's housing need has not been identified.

Additionally, there is scope for housing density in Oxford to be increased to that appropriate for a city so as to avoid overspill from its boundaries and the suburbanisation of the surrounding district. Urban development is far preferable to rural development from a climate change point of view as it employs existing public transport networks and relies much more on natural gas rather than oil.

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.

The plan should remove the allocation fo Oxford's 'unmet need' until this is actually and reliably identified.

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: STRAT5

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.

The plan for building density is to be applauded as best for the environment and for sustainability. However not all sections of the plan - particularly those in green belt sites - aim to achieve the densities set out here.

Q22. 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.

Other policies in the plan should be redrawn to make them consistent with STRAT5

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: STRAT6

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.

This section of the plan is not positively prepared, justified or consistent with national policy. If it goes through it will confirm all suspicions that councils only ever pay lip service to concerns about the green belt and are willing to promote the interests of property developers over those of local residents and the environment.

National Planning Policy says that green belt sites can be used for housing only after all other options have been explored and if no other land is available on which need could be met. There are 7 green belt sites proposed for development within this local plan. 11,000 homes, 30% of the plan's housing, are being proposed for green belt sites.

As I have argued before, the plan's assumption that the area needs 30,000 houses has NOT been demonstrated. The government itself says just 10,000 are needed. So it cannot be said that these sites are being drafted in in extremis, after all other options have been explored and when no other land is available. These houses are unneeded.

Q29. 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.

All building on the green belt should be struck out of the plan - it cannot be justified under national policy only to release green field sites in "exceptional circumstances".

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: TRANS1

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.

The plan acknowledges and yet does not actually take into account the enormous, transforming effect of the Oxford-Cambridge Expressway. This has not had the ultimate go-ahead and yet, if it goes ahead, work will start on it within the time frame envisaged by this plan. It is meaningless to draw up a housing plan and disregard a parallel plan for potentially 100,000 new homes within the same area.

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.

The local plan needs to chart how the Oxford-Cambridge Expressway plan could work - how it would function and interact with the proposals expressed here. All information about the magnitude and routing of the "growth corridor" (which has had no consultation or approval from local community) must be revealed, along with how the council intends to approach it.

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: H4 & Table 5F

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.

Several of the villages fall within AONB - Nettlebed, Woodcote and Goring among them.

The plan has allocated to them an arbitrary 15% growth and yet this contradicts STRAT1 in which it is stated that the plan has a strategy of: "Protecting and enhancing the countryside and particularly those areas within the two AONB and Oxford Green Belt by ensuring that outside of the towns and villages any change relates to very specific needs such as those of the agricultural industry or enhancement of the environment." A blanket 15% growth target cannot be responding to a local, very specific need.

Q43. 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.

Increases in housing and population within the AONB must be justified according to the needs and capacity of the local area. The case has not been made as to how this plan would benefit the area or how it responds to any specific needs (eg those of the agricultural industry or enhancement of the environment) as set out in STRAT1. The housing allocation must be redrawn to take into account any increase in burden on local services and amenities.

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

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: H5, H6 & H7

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.

The development plans for Nettlebed do not take into account the increased burden placed on the local services, environment and amenities.

Nettlebed already experiences heavy traffic at peak times of day and the local Commons Conservators who look after the Common Land struggle with damage to the commons from parking, fly tipping and litter. An increase of 46 homes as proposed might reasonably mean an increase of 184 journeys through the village per day (assuming two people from each home leave and return once a day) - and this disregards the increase in journeys made by some of the other 28419 proposed homes in the district.

Additionally the local NHS surgery would be stretched. Local Nettlebed doctor, Dr Lisa Silver, for instance, detailed back in 2017 how the development plan as it was then would affect her practice and pointed out that there has been no explanation about how medical services would be expected to cope: <https://www.nettlebed.org/dr-silvers-response-new-houses-nettlebed-post-gp-situation>

Nettlebed primary school already, in some years, has to turn down places to children who live within or within walking distance of the village. There is no explanation within the plan about how the extra capacity needed would be provided.

The post office, as stated in the plan, has now gone.

The plan does not address the actual need of Nettlebed and its environs or explain how it would support the new population.

Q50. 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.

The numbers of new houses chosen for Nettlebed - and not just the choice about where they should go - should be calculated after a clear assessment of need in the area and capacity of local services, amenities and environment. Any development must be of benefit to the area and not to its detriment.

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