

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="Dr"/>	<input type="text"/>
Full Name	<input type="text" value="Paul Harrop"/>	<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" value="██████████"/>	<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" value="██████████████████"/>	<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:

Policy STRAT7 – Land at Chalgrove Airfield

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.

STRAT7 is inconsistent with Strategic Objective OBJ 1.2, which highlights the need to “*Support rural communities and ‘their way of life’, recognising that this is what attracts people to the district.*” Chalgrove now has a Neighbourhood Plan which has now been agreed and adopted. This Neighbourhood Plan defines sustainable growth that is proportionate for Chalgrove. The Strategic Site proposed at Chalgrove Airfield is contrary to the aims of the Neighbourhood Plan and also contrary to the National Planning Policy Framework (NPPF), see paragraphs 12-14.

STRAT7 is in conflict with Strategic Objective OBJ 4.2, to “*Make sustainable transport, walking and cycling an attractive and viable choice for people*”. There are no options for safe cycle paths or foot paths between this proposed development at Chalgrove and any of the surrounding villages. The B480 – the single route in and out of Chalgrove - is too narrow for safe cycle paths. The remoteness of the Chalgrove site also means that it is not feasible to commute by cycle or on foot to significant existing centres of employment and major amenities such as Oxford and Abingdon. In contrast, other sites proposed in this plan are commutable by cycle or, in some cases, on foot. The other sites are well serviced by existing public transport connections and good road infrastructure to nearby areas of employment. This leads to the likelihood that Chalgrove would become a large, car-based settlement, as existing public transport is extremely limited, and proposed public transport improvements would be inadequate. Although some limited additional bus services are proposed, I understand that they cannot be funded by the County Council and would not provide a good network of commutable connectivity to major employment centres. This is contrary to NPPF paragraphs 8c, 102c, 104b & d, 108a-c, 110a & d.

STRAT7 is contrary to Strategic Objective OBJ 5.2, which states that is will “*Support development that respects the scale and character of our towns and villages, enhancing the special character of our historic settlements and the surrounding countryside.*” The proposal in STRAT7 would more than triple the size of the existing village community, which doesn't

respect the scale, unlike the developments set out in the adopted Neighbourhood Plan. An explosion of this magnitude would also result in a significant negative effect on the character of the village and the existing rural community. It is a rural village community and should be preserved as such, with sustainable and proportionate development as laid out in the Neighbourhood Plan. This strategy is contrary to NPPF paragraphs 12-14.

STRAT7 contradicts Strategic Objective OBJ 6.1, which is to “*Champion peighbourhood planning*” and “*to ensure that Neighbourhood Development Plans are deliverable, achievable and sustainable.*” The Neighbourhood Plan has set out and welcomed growth of almost 30%, far more than the 15% required by the Local Plan for larger villages (Local Plan paragraph 5.18). The Neighbourhood Plan will provide a sustainable increase in housing - an additional 320 houses – which will comfortably meet the needs of the community. This strategy is contrary to NPPF Paragraphs 12-14.

STRAT7 is contrary to Strategic Objective OBJ 8.2, which aims 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.*” Chalgrove is in a remote, rural area of south Oxfordshire, therefore carbon emissions of the proposed car-based settlement will be much higher than other sites that are closer to the major employment centres and already have connections to these centres via existing public transport infrastructure or are accessible by cycle or on foot due to their proximity. Similarly, deliveries of goods and services to the proposed new settlement at Chalgrove Airfield will necessarily be road-based, given that Chalgrove does not have a rail service and is not near to existing railway lines. These road-based deliveries will incur higher carbon emissions relative to other proposed sites, due to lack of rail connections and also greater road journey distances. This is contrary to NPPF paragraph 8c, 102c, 104b, 104d, 108a, 108b, 108c, 110a, 110d.

STRAT7, point 2(i), states that the proposal will deliver “*land safeguarded for the future operations of Martin-Baker*”. STRAT7 involves the removal of the existing runways at Chalgrove Airfield and replacing them with a single, far shorter runway. This would limit the operations of Martin-Baker and, further, it is also unimaginable what the cost and disruption of this would be, let alone the logic of re-siting a perfectly serviceable existing active runway. The proposal would build houses, schools and services immediately adjacent to an active runway, albeit with appropriate safety considerations, but noise would remain an issue for the new settlement. Martin-Baker also operates a pyrotechnic test facility at Chalgrove Airfield, involving regular and noisy, explosives tests. These tests are currently executed far away from the existing Chalgrove village housing. This test facility would be adjacent to the proposed new development, resulting in even more noise nuisance. It seems inevitable that noise nuisance to the new residents would be a significant factor with this proposal, regardless of any possible mitigation. 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 the site must also consider NPPF paragraph 95b - Martin-Baker is a major defence contractor and their operations would be adversely affected by the impact of proposed development on the site, both during the development and afterwards.

Paragraphs 4.64 and 4.65 in the Local Plan highlight the issue with the existing tenant, Martin-Baker, their opposition to the Local Plan and the requirement for a Compulsory Purchase Order, which Martin-Baker will also oppose. As a result, Paragraph 4.65 states that “*no completions are expected on the site until 2026/2027 at the earliest*”. This is contrary to NPPF paragraph 67a, which states that the “*Planning policies should identify a supply of specific, deliverable sites for years one to five of the local plan period.*” This proposed site at Chalgrove Airfield therefore does not meet this national planning policy requirement and should be removed from the Local Plan.

STRAT7 states that land needs to be secured for the significant improvement of infrastructure required to support such a large development at Chalgrove Airfield, as it proposed. Currently, it is understood that most of the land needed for these infrastructure improvements, including several road bypasses and road capacity upgrades, has not been secured. In addition, one of the proposed bypasses is situated on a flood zone of the River Thames. The road infrastructure improvements proposed will also result in a new vehicle route between the M40 and Oxford that will allow traffic to avoid the M40, A40 and A34, thereby significantly increasing road use in this rural area in an unsustainable way. This is contrary to NPPF paragraph 103.

(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.

The Local Plan can be made sound by removing the proposed site at Chalgrove Airfield.

(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:

09 February 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.**

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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