

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 Headington Action and Headington Neighbourhood Forum
Contact name Patrick Coulter
Address line 1 [REDACTED]
Address line 2 [REDACTED]
Address line 3 -
Postal town [REDACTED]
Postcode [REDACTED]
Telephone number [REDACTED]
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 13

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 is unsound

The Local Plan 2034 is a completely new plan and not, as the Council has suggested merely a modification of the previous version LP 2033. The forward refers to this as a "second publication version of the Local Plan" which is particularly misleading. The Plan seeks to build an additional 20% of houses to that indicated in LP 2033 (28465 vs. 22775). This is well beyond its declared need during the plan period to 2034 and is in order to obtain "additional flexibility" (Local Plan p86). The outcome will be enormous pressure on the Green Belt at Barton.

Consultation has not been legally compliant

The timetable is being driven by the District Council's need to meet the deadline set by the Growth Board rather than by the need to carry out a comprehensive consultation with local people in Barton and Headington. The pressure to meet this compressed deadline has meant that the Council has not carried out the legally required new assessment for a new plan and has not held a Section 18 consultation which would have allowed much more time for consultation with people in Headington and Barton. Instead the Council has held a Section 19 consultation which has not allowed sufficient time to evaluate the large number of complex documents and reach an informed view on the Plan.

Cross boundary consultation when undertaking strategic allocations is a requirement of the National Planning and Policy Framework (NPPF para 21 & para 27) There has been no consultation with Headington residents and requests by Headington Action and Headington Neighbourhood Forum to the Council for a public meeting in Headington were refused.

This is despite the reference in the Sustainability Appraisal that "a good and informative method of consultation be undertaken with the residents of Barton and Headington"

(see LP 2034 introduction para 1.6 2.11 Strat 1, Strat2 (housing requirement) and SODC Topic Paper Housing Needs Housing Supply and Housing Densities Jan 2019 2.7 p2 2.15-2.17 p4 para 2.22 p5 Table 2.1 p5 and para 2.28a pp 7-8 (table of annual housebuilding under three different scenarios and description of Oxfordshire Growth Deal; SODC Scrutiny Committee Public Pack 13 Dec 2018 Report of Head of Planning para 70.)

Local Plan 2034 is like no other plan in its scope and ambition. SODC should have been treated it as an entirely new plan that required an entirely new series of assessments and regulation 18 public consultations lasting many months.

The proposals for transport infrastructure for the LNBB have not been subject to a detailed assessment in preparation of LP 2034.

The combined effects of the two new roads, one internal and one to the A40 have not been assessed by either SODC or OCC. The site is likely to become a cut through for traffic seeking the quickest route to the A40.

SODC and Oxford County Council acknowledge that developing LNBB will increase pressure on the existing local road network including Bayswater Road and the A40 Headington Roundabout. Yet the impact of these new roads on Headington has not been evaluated. There are no proposals to mitigate the likely increase on traffic and congestion in Headington. The Headington London Road is already one of the busiest roads in the County. This increased congestion will worsen air pollution in Headington yet SODC has not carried out any Air Quality risk assessments. There are no measures put forward to mitigate the impact of the proposal on Headington.

Once again SODC has not gathered the evidence to justify the selection of the site as a strategic allocation. It is unsound to justify the release of Green Belt land for a proposal which harms the existing road network and the local communities, like Headington, which depend on that network.

(LP 2034, Obj 4.2 p. 22, LP Strat 13 3. iii p. 72, Trans 1b vi p.152, Trans 5 1. iv & vi ENV12 1 (development and pollution) p.188; para 8.45 (AQMA) p.189 EP1 NPPF para 102 (p.30) para 103, para 181 para 138 p. 41)

The evidence does not support the case for exceptional circumstances which would justify releasing the Green Belt at LNBB for development.

The NPPF (para 71b and 72b) and Government Policy make it clear that local authorities must protect the Green Belt and explore all other options before seeking to argue exceptional circumstances for permitting development in the Green Belt.

In the Oxford Green Belt SODC proposes 4,950 homes to be delivered from 2024/25 at the Grenoble Road, Northfield, and North of Bayswater Brook strategic allocations to meet Oxford City's contribution to the Growth Deal. However there is no need to build on this site as SODC already seeks to build 6000 homes in excess of local need (LP Table 5c p87) even having taken account of its commitments to the Growth deal

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 Plan should be classed as a new plan with a new series of assessments and regulation 18 consultation. The area of Headington should be fully included in the consultation.

The proposals for transport infrastructure for the Land North of Boundary Brook should be subject to a detailed assessment including their impact on Headington and Marston..

The impact of traffic for the Land North of Boundary Brook should be the subject of an Air Quality Risk Assessment which would include the Headington and Marston areas

The case for exceptional circumstances to release the Green Belt at Land North of Boundary Brook should be reassessed using the figures for housing need nett of the additional 6000 units included for "flexibility" (LP Table 5c p87)

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?

No