

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	Mr
Full name	Dominic Aurelian Holdsworth
Business / Organisation name (if relevant)	-
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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: The Overall strategy

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.

1. (a) The overall strategy is not legally compliant: there has been no Section 18 consultation on the (apparently random) increase in forecast housing provision. This is an affront to local democracy and an illegal assault on the Oxfordshire countryside.
(b) Further, the NPPF states the green belt should be used as a last resort, whereas it is being used as a first resort. There are brownfield options within Oxford that should be used in lieu.
(c) Finally, the alleged 'unmet housing need' for Oxford (which has created the overspill into SODC) was not calculated using the latest Govt methodology
2. The duty to cooperate doesn't apply because there is no unmet housing need from Oxford. See 1c above.
3. The soundness of the overall strategy is entirely deficient because:
(a) the SODC district does not have the road / health / educational infrastructure to support this growth in housing and population
(b) the growth in traffic will create congestion on the district's already crowded network and add to a growing health problem from vehicle emissions and noise pollution.

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.

- 1(a) A Section 18 consultation is required on the revised housing provision forecasts forthwith.
(b) Greenbelt land should be removed from the Plan forthwith. The green belt was established as a conservation designation, not as a land bank for future development. I can't believe it's even necessary for members of the public to remind the planning experts of such obvious points. But there we are: it is necessary and so I am.
(c) The 'unmet housing need from Oxford' should be calculated using the latest Govt methodology. When it becomes apparent that the city has no unmet need, this element of the housing target should be removed from the SODC plan.
2. The duty to cooperate should be revisited in line with point 1c above
3. Soundness: SODC should re-examine its capacity for housing growth alongside its limited capacity for traffic and infrastructure growth, and challenge the Govt on its ability to meet the absurd targets that have been proposed.

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

Page 9: Part B - your comments

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 13 Land North of Bayswater Brook (+ Wick Farm and Lower Elsfield)

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.

1. Legal compliance:

(a) No Section 18 consultation was carried out on the proposed Bayswater farm development, as required by the planning rules.

(b) The NPPF states the green belt should be used as last resort. The Bayswater / Wick Farm / Lower Elsfield development is an unacceptable, unsupported, ill-thought-out assault on a cherished component of the English planning system, namely the green belt. What on Earth was the point in ever establishing a conservation designation if a later set of planners are just going to build on it? Would you propose the same for an AONB? Or a Natl Park?

(c) Oxford city's supposed 'unmet housing need' was calculated with an out-of-day's methodology. In truth, there is no unmet need and the Bayswater farm development should be dropped.

2. Soundness:

(a) The proposed development will increase flooding from Bayswater Brook. Obviously. You have presumably noticed that the current development East of the ringroad is already doing this? If you haven't, go and observe. It is, by the way, what tends to happen when you pour concrete over green fields: run off increases, soak away decreases and water courses flood. Duh.

(b) The SSSIs at Sydlings Copse and College Pond will be degraded by the proximity of development / noise / construction traffic / increased human population.

(c) Economic viability of this development is dubious given the cost of the access road, schools and other amenities, it is obvious now that developers will NOT meet the 50% low cost housing requirement. They will try to dodge this requirement - and we could end up with another monoculture of commuter grit executive housing.

3. Duty to cooperate:

See point 1c above. The city's unmet housing need has been miscalculated using the wrong methodology.

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.

1. (a) Conduct a Section 18 consultation on this development.

(b) Look up the NPPF guidance on green belt development and remind yourselves that it is a conservation designation not a land bank. And then remove this development from the overall strategic plan.

(c) Recalculate Oxford's housing need using the latest Govt methodology and then, when you've found there is no unmet need, remove Bayswater Brook / Wick Farm / Lower Elsfield from the strategic plan

2. (a) Conduct a proper flood risk analysis for this development. Then cancel the development.

(b) protect the SSSIs as you are legally obliged to do. Cancel the development.

3. Recalculate Oxford's housing need correctly.

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?

No