

# 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](mailto: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="Mr"/>	<input type="text"/>
Full Name	<input type="text" value="Clive JENKINS"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="██████"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="██"/>	<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:

I have focused solely on the main SODC plan, referencing by its paragraphs or a sequence of them e.g. 4.72; 4.69–72. Proposed new developments I have put in bold italic, e.g. ***Grenoble Road***, to distinguish them from existing communities often of the same name.

Do you consider the Local Plan and supporting documents:

- |                                       |                              |  |  |
|---------------------------------------|------------------------------|--|--|
| (1) are legally compliant             | Yes <input type="checkbox"/> | No <input type="checkbox"/>            | Don't know <input checked="" type="checkbox"/> |
| (2) are sound                         | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Don't know <input type="checkbox"/>            |
| (3) comply with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/>            | Don't know <input checked="" type="checkbox"/> |

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.

**Unsound** The laudable commitment to conserving the countryside (OBJ1.2; 5.2; 7.1; 4.14; 4.57–58; STRAT 6) is incompatible over much of the district with the scale of development proposed. Both Berinsfield (4.76–89) and Culham will jump suddenly from village to town size. The expansion of Culham (4.69–72) will destroy open country to its south and north linking with Didcot and Abingdon which itself is *only just* separated from Oxford as it is. Effectively the ***Science Vale*** (4.40–44) spells ribbon development from Didcot to Oxford.

The plan defends building on green-belt land at Berinsfield and Culham (4.77; 4.72) as it is simply its outer edge and so does little to check urban sprawl. Ironical as the three proposals for the **inner Oxford green belt: *Grenoble Road*** (4.90-101), ***Northfield*** (4.102-06), ***Bayswater*** (4.107–118) all extend that urban sprawl massively. Add Cherwell Council's proposals for the northern environs of the city, and most of the inner green belt will go: ***Grenoble Road*** will extend the city well out into South Oxfordshire smashing any policy of containment thus severely reducing access to the countryside for residents of what is already a significant urban extension: The Leys; and this *without* consultation although it differs significantly from the agreed plan of 2017. Improvements of infrastructure would be inadequate, especially as traffic would greatly increase. The high housing density would swamp the existing village of Sandford. ***Northfield***, despite efforts to maintain a thin green line of separation, will join up with ***Grenoble Road*** and quickly subsume the villages of Horspath and Garsington into a Greater Cowley.

The least sound proposal is ***Bayswater***, flawed in every way, which the convoluted style in which the document tries to deal with this only points up. If ***Bayswater*** is built on the gently rising hills it will destroy part of Oxford's historic setting. Any development on lower ground will still be visible enough to do that, and also liable to flooding as the area's very name implies. It is rich in archaeological sites, SSSIs, watercourses, woodlands and nature reserves which will all be damaged. So ***Bayswater*** will be an exercise in multi-faceted destruction and on the far side of the ring road so access to the city itself are poor; existing roads "are already under significant pressure"; new ones would have to be built. (*Continued on p. 5*)

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.

#### MODIFICATIONS NECESSARY

**Legal compliance:** It is claimed that there has been NO consultation on the sudden switch of *Grenoble Road* to development when SODC re-affirmed its green-belt status as recently as 2017. There should be such consultation now, even belatedly.

**Soundness of Plan:** The SODC should base estimates for housing provision and its knock-on development on recent fairly modest official forecasts, not on the discredited SHMA figures, which are inflated, and outdated as they were produced in 2011.

Closely linked to the above: Make every effort to avoid building the thereby modified housing provision in the Oxford inner green belt and at Culham and Berinsfield. At the moment most development is to be dumped in them as a matter of course, to the destruction of virtually all the inner Oxford green belt which lies in South Oxfordshire; and at *Culham* and *Berinsfield* a good chunk of the outer. Some development at those two villages strikes me as viable and acceptable but not on the swollen scale proposed.

Shelve the Growth Deal, a catalyst of inflation and distortion, which just offers subsidies which would largely be unnecessary without it, so circular, and which will be sorely inadequate to fund the extra infrastructure it will try to force on the Las in any case.

Take farming i.e. *food production* seriously.

Not to be entirely negative: *Chalgrove airfield* and *Wheatley campus* seem good places for new housing as they are developed areas already, if the formidable logistical problems – the need for new roads – around Chalgrove can be overcome which they probably will be.

(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:  Date: 14 February 2019  
*(this can be electronic)*

### 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](http://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.**

*(Continued from p. 2)*

**Bayswater** (4.116), **Grenoble Road** (4.98), and **Berinsfield** (4.77–82) are also promoted as likely to regenerate the depressed settlements already adjacent. Why would they do that? Greater Leys was built to presumably the highest contemporary standards only 30+ years ago, but is trumpeted here as the most deprived estate in Oxfordshire, which says little for the regenerative effect on their hinterland of building state-of-the-art new estates. And if largish urban agglomerations *are* good raw material to effect urban amelioration, they already exist in Greater Leys/Blackbird Leys/Cowley, and Barton, Barton Park itself brand new, and the adjacent parts of Headington: extensive enough in each case to take regeneration forward.

The very basis of the estimates of housing need – the SHMA (4.20–32) behind all these proposed developments – is seriously flawed. SODC admits these figures are outdated going back to 2011, so nearly ten years old, *and* inflated; but instead of seeking to remedy this, the SODC Plan deals with the flaws by ignoring them and claims that, whatever its weaknesses, SHMA offers the only comprehensive estimate of housing need available. This is not only lame but untrue: there are recent government estimates which put a far lower figure on housing need. This varies by area but is broadly half that of SHMA.

The SHMA figures are pernicious: not only do they inflate SODC’s own projected housing provision beyond what is actually needed, but also Oxford City’s (4.25–31). And so they inflate the allocations that SODC and its fellow rural authorities are taking to help the city meet *its* thus exaggerated housing need. With the various top-ups, the plan envisages 28,465 new houses, whereas the previous SODC Plan allowed for 10,000. The councils will intermittently admit this exaggeration – though mostly they try to fudge it – but say it is necessary if they are to get the subsidies of the central-government-driven Growth Deal. But these in any case will be inadequate to finance the building, let alone the requisite extra infrastructure. Hence the Oxfordshire authorities are colluding in the destruction of large swathes of countryside for a vanity project.

“Large swathes of countryside” means farm land. SODC stresses that it is a rural authority, but does not take the implications of this seriously. The oldest economic activity of the District and the one which takes up by far the most space is taken as read. Farm land is not just an amenity affording a pretty picture (see p. 6) or a void useful for building on; it produces food – and we all have to eat. In these uncertain economic times, we reduce our domestic capacity to produce food at our peril. Land should not be switched from farming to building slap-happily as if it were itself a sort of snack tray with an endless renewable supply to feed voracious urban growth. I struggled and failed to find a section devoted to agriculture under “Economy” except for a marginal glance at dwellings for rural workers on pp. 117–18.

**Alternative formats of this form are available on request.** Please email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) or call 01235 422600 (Text phone users add 18001 before you dial).

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