

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	Susan Jepson
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	████████████████████

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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: whole local plan document

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 Local Plan is clearly a new plan for several reasons: the number of strategic development sites has increased to 7 (from 3) without there being comprehensive appraisals on the additional sites; the proposed houses have increased, without any consultation, from 22,563 (in the last local plan) to 28,459. There is no known rationale for the increase of either sites or houses.

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.

A section 18 consultation needs to take place. The plan does not comply with the South Oxfordshire statement of community involvement planning service.

Q10. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Q11. Would you like to comment on another policy or paragraph?

Yes

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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: Main Plan document 2.3iv) page 15 NPPF on Green Belt Strat1, Strat 6 S Oxfordshire statement of community involvement planning service June 2017 para 4

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.

The plan does not comply with the new NPPF 13 on the Green Belt. It is in opposition to NPPF 134 since it seeks to destroy the Green Belt around Oxford by permitting Oxford to merge with and swallow surrounding villages etc destroying the individuality and history of the surrounding villages; encouraging urban sprawl of Oxford into the precious countryside, destroying both that countryside and the green and quiet environment. It also encourages Oxford City to build more business premises rather than homes. And all this without any public consultation.

NPPF 135: The Green Belt should be changed only where there are exceptional circumstances. There are none (or not that have been presented). There is no unmet Oxford housing need (which might have been an exceptional circumstance): the numbers have not been correctly calculated. New housing near the boundaries of Oxford is damaging and unnecessary particularly since there is no way of commuting into Oxford, whereas building houses near railway stations would permit green and useful commuting.

NPPF 137 states "the authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development". The Council has not done this. Of the 15 potential sites, it has chosen 7, 6 of which are in the Green Belt. In addition SODC has inflated the housing needs without justification.

NPPF 137 (c) SODC has selected Strategic Sites within the Green Belt without any reference to any county transport strategy which would put connectivity, not proximity, above all else in meeting unmet housing needs.

S 110 of the Localism Act 2011 imposes a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation . This doesn't appear to have taken place in relation to commuting into and out of Oxford City.

NPPF 138 : no consideration has been given to "ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land"

NPPF 139 f) There will be no clearly defined boundaries for the Green Belt when the "Land North of Bayswater Brook" is removed from the Green Belt. There is nothing but barbed wire and a few hedges (all of which are moveable at any time).

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.

Remove the new strategic sites in Oxford's Green Belt from the Local Plan.

Q17. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Q18. Would you like to comment on another policy or paragraph?

Yes

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: Green Belt study (September 2015) and Green Belt Assessment of Strategic Sites in S. Oxfordshire

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 studies state in relation to Lower Elsfield and Wick Farm sites that "development within the parcel would therefore lead to significant harm in relation to urban sprawl, encroachment on the countryside and to the setting and special character of Oxford" notwithstanding which they are now strategic development sites.

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.

What is now called "Land north of Bayswater Brook" should be removed as strategic development sites.

Q24. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Q25. Would you like to comment on another policy or paragraph?

Yes

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: Main document 1.6, policy strat 13

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.

Land north of Bayswater Brook: in the earlier local plan these were separate sites with no linking road. Bayswater Farm hadn't been considered and is missing from the background paper. No s18 consultation.

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.

The new site with its major road through the middle must be subject to S 18 consultation

Q31. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Q32. Would you like to comment on another policy or paragraph?

Yes

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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: main doc Strat 13

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.

Bayswater Farm is a new proposed development site and hasn't been through a S18 or any other kind of consultation

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 site must be the subject of a S18 consultation and be removed from the plan.

Q38. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Q39. Would you like to comment on another policy or paragraph?

Yes

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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: The plan as a whole

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.

The local plan was prepared in such a hurry that the councillors couldn't access the background docs when they were scrutinising or voting. The approval process was flawed.

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.

The plan should be subject to an open and legally compliant process and a s18 consultation.

Q45. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Q46. Would you like to comment on another policy or paragraph?

Yes

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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: Housing for Oxford City 4.29-4.31 H9 Strat 2 page 8c)

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.

Housing topic paper page 8c) The Council states "unmet need: the guidance is clear that unmet need from neighbouring authorities should only be added to our plan's housing need (not requirement) where this has been calculated using the standard method". The standard method was NOT used.

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.

There can't be a duty to co-operate if the incorrect calculation methods are used. There is no duty to co-operate since Oxford City has no unmet housing needs and can itself build all the houses it needs within Oxford City.

There is no necessity for houses built to help Oxford to be near Oxford: the difficulties of and pollution caused by commuting haven't been addressed. Building houses on Green Belt only increases pollution.

Q52. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Q53. Would you like to comment on another policy or paragraph?

Yes

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Q54. 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: Housing for Oxford City 4.29-4.31 H9 Strat 2 Housing Topic Paper p 8c) and Oxford City Local Plan HELAA Appendix B

Q55. 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		

Q56. 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.

Oxford City has severely rested the development of housing as opposed to development for business/employment. City will not allow employment land to be used for housing despite the fact that there are many empty and unused employment sites in Oxford and shops in the centre of Oxford. Oxford City has deliberately created a housing need. Also there are staff and skill shortages in their local plan.

Q57. 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.

New jobs should be created outside the City rather than in it: better for the environment and beneficial for commuters. Then there would be more housing sites in the City.

Q59. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

No

Q60. 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