

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	Alan H. Jones
Business / Organisation name (if relevant)	-
Job title (if relevant)	-
Address line 1	██████████
Address line 2	██████
Address line 3	-
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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: Local Plan Policy STRAT1

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 and not justified. The number of new homes proposed is excessive and not justified by any real existing local need. It is also unlikely to be deliverable, the build rate being far in excess of anything achieved before. Furthermore the housing numbers and their proposed distribution are inconsistent with the Plan's vision of South Oxfordshire continuing to be a desirable place to live and work, nor are they consistent with national policy requirements to protect both Green Belt land and, in particular, Areas of Outstanding Natural Beauty. The latter, by definition, have landscape characteristics deserving of protection whereas some Green Belt land derives its status merely by virtue of its location adjacent to urban areas rather than by any inherent special landscape character.

I support the more detailed views of CPRE.

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 proposed housing numbers need to be reduced to more realistic levels and greater attention needs to be given of the constraints posed particularly by AONBs.

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: LP Policy STRAT2

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.

Unsound. There seems to be great uncertainty as to the extent Oxford City's unmet need, as explained by CPRE and others. None of this should be included in SODC's plan until the position is clarified.

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 provision for Oxford City's unmet need.

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

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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: Policy H4, Table 5f, paras 5.18 to 5.33

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.

This Policy is unsound, not properly justified, undeliverable and not consistent with national policy. It has also failed the duty to cooperate by ignoring or overlooking evidence available from parish councils and their neighbourhood plans. H4 This policy is unsound, not properly justified, ineffective and inconsistent with national policy.

The allocated number of dwellings are derived mathematically without any consideration of the capacity of the villages to deliver these numbers. They do not take any account of national policies that may affect the ability of the village to deliver the allocation. They also do not consider currently available evidence on landscape capacity, including LVIA's (as now required by SODC for Neighbourhood Plans), some of which have already been commissioned by SODC and others supplied to them by Neighbourhood Planning groups.

Paragraphs 5.19 and 5.20 say that development in the larger villages should be proportional, appropriate and dependent on existing infrastructure but the mathematical model does not consider the capacity of the existing infrastructure. It is also claimed that the allocated level of growth will support local services and facilities and result in a sustainable and balanced distribution of development. This claim is unsound because the allocation is derived mathematically without consideration as to whether the proposed level is appropriate and can be supported by existing infrastructure. Furthermore, no evidence is given that these villages need additional support and how they would specifically benefit from the proposed level of development..

Paragraph 5.30 acknowledges that some villages are constrained by factors such as Green Belt, Areas of Outstanding Natural Beauty, and Flood Zones and that in these villages a 15% growth may not be fully achievable. However the Plan makes no attempt to assess the impact of these factors and the relevant national policies. This is of particular relevance to Goring which sits entirely within the Chilterns AONB and is partly subject to flood zone constraints. It is therefore not sound to claim an effective allocation strategy and require neighbourhood plans to deliver it while at the same time acknowledging there are constraints, particularly with respect to the AONB and Flooding, but not taking these into account. Indeed it is misleading and dangerous to include in the LP housing numbers that will never be deliverable.

A better approach would be for the LP to say that the mathematical model provides only indicative housing numbers, for guidance only, for development in the few larger villages where this original cross-the-board concept has not been superseded by other planning events.

The LP should now therefore incorporate a mechanism which allows for the appropriately-evidenced outputs of neighbourhood plans to determine the definitive housing numbers for each village. Goring on Thames has developed a Neighbourhood Plan which is currently in its examination phase. The constraints highlighted by the LVIA undertaken in 2016 and in a strategic flood risk assessment and sequential test, limit the number of acceptable sites to 4 with approximately 94 dwellings. This information has been available to SODC since 2017.

Policy H4 includes a threat to allocate sites in a parish if the neighbourhood plan does not progress towards allocating sites for the housing number specified in the LP within a specified timescale. The LP says that it will use the published Strategic Land Availability Assessment to identify suitable, available and achievable sites. The January 2019 SHELAA and its appendices cannot be regarded as accurate or reliable evidence in relation to any assessment of potential residential development sites. In relation to Goring-on-Thames at least, it is inaccurate and incorrect as it includes sites previously excluded from consideration by SODC on strong LVIA grounds and sites double-counted by their inclusion within several submissions.

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.

Policy H4 and the paragraphs (5.18 to 5.33) relating to the larger villages should be rewritten to acknowledge that the mathematical model used to propose housing numbers for the larger villages provides only indicative numbers for guidance only. This section of the Plan should also incorporate a mechanism which allows for the appropriately-evidenced outputs of neighbourhood plans to determine the definitive housing numbers for each village.

The threat of imposition of the outputs of the model by SODC without recognition of national policy constraints should be removed from policy H4.

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

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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: Policy STRAT5, para4.52 to 4.56

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.

Policy STRAT5, Residential Densities, is unsound, not properly justified and inconsistent with national policy.

The policy applies an arbitrary residential housing density to all villages and smaller settlements that is not justified by any evidence and does not conform with NPPF. The minimum density proposed for new developments in these villages, including Goring, is far in excess of the average density of existing development in Goring and is only perhaps met by a few compact locations in the village. Since most new development in Goring is likely by necessity to be on its edges, a density of 45 per hectare would be completely out of place, especially considering the village's location within the Chilterns AONB. Similar consideration probably apply to many other villages, especially those within the AONBs.

Whilst the NPPF 2018 paragraph 122 says:

"Planning policies and decisions should support development that makes efficient use of land..." it goes on to say account should be taken of:

"b) local market conditions and viability;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places."

A major reason that Goring is an attractive place to live and for tourists to visit is its current spacious character. Changing this to any great extent through overdevelopment would adversely impact on all the above and thus would conflict with the quoted national policy as well as those relating to AONBs.

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 minimum densities quoted in Policy STRAT5 for larger villages, smaller villages and other locations should be reduced to a less potentially-harmful level, probably to the 25 dwellings per hectare given in previous draft versions of this LP. Also the caveat following the table of proposed densities which gives reasons for supporting even lower densities should include protecting the prevailing character of an area.

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?

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

