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South Oxfordshire District Council
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Planning Inspector

Representations to SODC Local Plan 2011–34 Final Publication Version 2nd, January 2019

Part A

1. This is a response as an: INDIVIDUAL

2. Personal details

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Part B

Separate sections for each representation are presented below.

Oral examination:

- Response: **YES**, I wish to participate at the oral examination
- Reason: I can give detailed information about the Culham Science Centre, which is central to SODC's strategy

Peter Kirby

1 Representation: STRAT 8

STRAT 8: Culham Science Centre

I consider that STRAT 8 is: **unsound**

Details

STRAT 8 is unsound because it is a collection of misleading statements that do not represent reality.

Fundamental issue:

1. The fundamental issue here is that the UKAEA wishes to establish a commercial property portfolio in the green belt at Culham
2. UKAEA is a government-owned commercial landlord with a legacy of fusion research
3. UKAEA owns land in the green belt at Culham for historical reasons (public ownership established by compulsory purchase by central government, c. 1946)
4. SODC strongly supports the UKAEA's wishes in order to give political traction to its own development plans in STRAT 9

Particular points (local plan pp. 49–50):

5. The continued existence of Culham Science Centre (CSC) depends on state funding (UK and EU) and Brexit may present an existential threat
6. 'leading UK centre for fusion research' is false praise because CSC is the UK national centre by *intention*, and maintained by c. £1 billion government funding since 1960
7. The 'Centres of Excellence' are new projects and were given that title when they were created, so the 'excellence' is merely hollow, promotional language
8. Moreover, the projects concern esoteric technical subjects and will provide only very limited employment (c. 100 staff)
9. The work at CSC does not require infrastructure development
10. There is absolutely no need for CSC to be inset from the green belt
11. SODC's 'exceptional circumstances' (para. 4.72) in this respect are remarkably weak and do not bear scrutiny (see detailed response below)

Housing:

12. 'sustainable location' implies a close connection between employment (STRAT 8) and housing (STRAT 9), but that is demographically false and purely wishful thinking
13. In reality, housing developed under STRAT 9, supported by STRAT 8, would become a commuter town for London via Didcot

Green belt:

14. 'The site is at the outer edge of the Green Belt' is an essentially meaningless attempt to imply an insignificant change
15. However, that outer edge is still green belt and green-belt legislation still applies; the phrase provides no justification for the damage to the environment
16. STRAT 8 is in conflict with green-belt policy because the 'exceptional circumstances' provided by SODC are merely weak rhetoric and are in no way exceptional

17. STRAT 8 conflicts with STRAT 1, ‘Protecting ... Oxford Green Belt’, so the local plan is self-contradictory

In addition:

18. ‘Science Vale’ is merely a marketing term for commercial development at Didcot, and has no other significance
19. Reference to Culham railway station is misleading because it is merely a rural railway halt (cf. main-line Didcot station) and there is no *actual* plan to modify it

Detailed response:

20. I am the author of the *Briefing Document on Employment at the Culham Science Centre*, which is part of the submission from Culham Parish Council
21. That document provides a substantial discussion of the relevant issues, in particular a critical analysis of SODC’s ‘exceptional circumstances’

End of STRAT 8 representation

2 Representation: STRAT 9

STRAT 9: Land adjacent to Culham Science Centre

I consider that STRAT 9 is: **unsound, not legally compliant, not compliant with duty to cooperate**

Details

STRAT 9 is unsound and non-compliant because it is essentially a plan to monetize the green belt and is contrary to all considerations of actual housing need, green-belt legislation, actual employment prospects, existing transport problems and environmental impact.

Actual housing need:

1. SODC has inflated its figures for housing requirements
2. The government’s standard method (2016) of calculation gives a value of 556 per year
3. SODC is using a value of 775 per year
4. Oxford city gives the value of 3750 as South Oxfordshire’s contribution to its unmet housing need (a contentious draft value)
5. SODC uses the value 4950
6. SODC’s calculations are unsound for those reasons

Green-belt legislation:

7. STRAT 9 does not comply with national policy on green belt, which was strengthened in July 2018 (NPPF)
8. SODC’s ‘exceptional circumstances’ (para. 4.72) in this respect are remarkably weak and do not bear scrutiny (see *Briefing Document* below)
9. In particular, the disposal of green-belt land to fund infrastructure development does not constitute an exceptional circumstance

10. The *Green Belt Appraisal of Strategic Sites in South Oxfordshire* (Dec 2018) showed that the removal of this part of the green belt would cause a high degree of harm
11. The proposed development will link Clifton Hampden, Culham and Abingdon to form a ribbon development
12. In the long term, the development will allow the northward expansion of Didcot to join Abingdon ('Culham and Didcot Garden Town')
13. STRAT 9 conflicts with STRAT 1, 'Protecting ... Oxford Green Belt', so the local plan is self-contradictory
14. The latest statement from the Prime Minister, and also the housing minister James Brokenshire (BBC Radio 4, 11/1/2019) is that the green belt should be protected

Employment:

15. SODC uses the catch-phrase 'Science Vale' as a vanguard term, but it is merely a marketing term for commercial development at Didcot, and has no other significance
16. SODC is using the Culham Science Centre as a political tool with which to subvert the protection of the green belt
17. In particular, SODC is making exaggerated claims about employment prospects in order to justify the construction of what is essentially a new *town*
18. In fact, the employment prospects are subject to considerable political and financial risk, including an existential threat from Brexit
19. I am the author of the *Briefing Document on Employment at the Culham Science Centre*, which is part of the submission from Culham Parish Council
20. That document provides a substantial discussion of the relevant issues, in particular a critical analysis of SODC's 'exceptional circumstances'

Transport (road):

21. The proposed development will cause huge traffic problems on the A415, which already has large queues at peak times (at Abingdon and Clifton Hampden)
22. The traffic problems have the potential to be a blight on day-to-day life in the area
23. There is a fundamental flaw in the SODC plan: traffic problems are, *prima facie*, a substantive issue, but detailed traffic modelling is not available to inform the plan
24. The absence of detailed traffic modelling is an unacceptable omission of critical (and almost certainly adverse) information
25. The A415 traffic problems will have a major negative impact in the centre of Abingdon in terms of both traffic queues and atmospheric pollution

Transport (rail):

26. An enlarged Culham railway station is conjectured as a support for the proposed development (p. 53)
27. The conjecture is highly questionable because there is no *actual* plan by the railway authority to change the station from its present status of a rural railway halt
28. Any change to the rail service depends on wider national decisions and time-scales, so its inclusion in the plan is pure speculation
29. Moreover, the presence of Grade II* listed structures at Culham railway station will present a major obstacle to any future development
30. An enlarged Culham railway station would have serious adverse consequences for the area:

- (a) traffic problems on the A415 would be increased greatly
- (b) green-belt land would be destroyed to provide a station car-park

Environmental:

- 31. The proposed development will have a significant negative impact on the environment:
 - (a) loss of habitat for many species
 - (b) loss of prime agricultural land
 - (c) adverse public health effects from atmospheric pollution
- 32. The CPRE video that is part of the submission from Culham Parish Council, and publically available at www.saveculhamgreenbelt.org illustrates these points

Overall:

- 33. STRAT 9 is unsound because it is based on fragile arguments that have no credibility and can be challenged on every aspect
- 34. STRAT 9 is not legally compliant because it contradicts green-belt policies
- 35. STRAT 9 is not compliant with the duty to cooperate because it subverts that duty and uses it as a scheme to inflate the housing numbers

End of STRAT 9 representation

End of document