

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	PATRICIA LEE
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	████████████████████

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: LP2034

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.

CONSULTATION PROCESS - non compliant with Planning rules.
SODC plans to release land from the Green Belt (LP 2034 p.86) to provide 10375 houses and 28,465 by 2034. This plan is NOT a revision of 2033 but a totally new plan that the SODC and the other seven Oxfordshire District councils have signed up to which is the Growth Deal brokered by the Growth Board of the government in order to get their share of £215 million for infrastructure and housing. This amount divided between all of Oxfordshire's District Council over the next 15 years is totally unrealistic in meeting the unknown infrastructure costs for these communities.
For LP2033 SODC conducted separate assessments of Lower Elsfield and Wick Farm. SODC rejected them as strategic allocations. Both now are merged into a new whole: Land North of Bayswater Brook (LNBB) but SODC have not actioned a new detailed assessment. SODC has not listened to the recommendations of its own planners and consultants. The LNBB is a greater allocation and has different potential impacts. And as such should be treated as an entirely new plan which requires an entirely new series of assessments and regulation 18 public consultations. Assessments and Consultations are required by law when presenting new plans. The council's approach to assessments about this site does not comply with NPPF para.170:
"Planning policies and decisions should contribute to and enhance the natural and local environment 'these should be done by SODC to 'prevent new and existing development from contributing to, being put at unacceptable risks from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.'
To meet the housing needs of future generations SODC needs to conduct Cross-Boundary consultation as this is one of the prerequisites of assessing and selecting strategic allocations. It appears that SODC have not allowed time to undertake this statutory commitment (NPPF para 21 & para 27).

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.

Welcome to the Local Plan 2034 for South Oxfordshire. This is an important document because it sets out our aspirations for housing, employment, and supporting infrastructure in our area up to 2041. We had planned to submit the previous Publication version, Local Plan 2033, for examination in 2018, but uncertainty about deliverability of some sites caused us to review strategic options. Changes to National Planning Guidance which was published in 2018, have had profound changes on Local Plan 2033 and therefore with our commitment to the Oxfordshire Growth Deal which has shaped our new housing targets and the number of strategic allocations that we want to develop in the Green Belt around Oxford to contribute to the city's unmet housing need in line with the terms and conditions of the Growth Deal.

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

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 2034

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.

UNCERTAIN DELIVERABILITY of Land North of Bayswater Brook (LNBB)

SODC is non-compliant with National Policy Planning Framework (July2018): Many of the policies are aspirational but not deliverable because the SODC has not gathered robust evidence to support them. National Planning guidelines (NPPF para 16b and para 30)

The council is require to carry out up-to-date, site-specific and detailed assessments of impacts from the LNBB development on transport, air quality, human health, ecology, flood risk, trees, landscape, views, heritage and archaeology.

Land North of Bayswater Brook (LNBB) has never been assessed as an integrated site. The Strategic Site Selection Background Paper, Part 1 January 2019. (p409) recommended a detailed biodiversity assessment of the two Sites of Special Scientific Interest (SSSIs) next to the site and the conservation target areas near LNBB It selected the site without a biodiversity study which it is now in the process of conducting.

SODC admits, the deliverability of LNBB is far from secure. The Head of planning stated to SODC's Scrutiny committee 'that there is a need for more evidence on ecology. There is significant risk about the ability of SODC being able to demonstrate the deliverability of this strategic allocation.

Biodiversity

Close to where I live there are two SSSI's (Site of Special Scientific Interest). These are Sydlings Copse and College Pond (which is on the boundary line).

These SSSI's are unique and they are to be cherished and protected.

Plants including the common rock-rose, knapweed, cowslip, yellow rattle, wild basil, hairy violet, bog-pimpernel, columbine and so many more fragile plants. So many beautiful Butterflies; Brimstone, Comma, Orange-tip and many others are all in danger of disappearing from our surrounding countryside.

These SSSI sites were both previously included in Local Plan 2033. Both were assessed and both rejected.

These two SSSI have now reappeared in LP2034. This is South Oxfordshire strategy allocation for Land North of Bayswater Brook (LNBB) which is totally unsound and inconsistent with national planning guidelines (Strat 13 LP 2034)

The SODC's Ecological Council previously identified these two sites; College Pond (which is on the boundary line) and Sydlings Copse as a "high-risk allocation, having significant potential effects on biodiversity" (Sustainability Appraisal of Publication Version of the Local Plan 2018 Appendix 1 p. 1179). The SODC is failing in its obligation to avoid development that causes significant harm to biodiversity and these two SSSI's. The policies are non-compliant with all sections of NPPF para 175.

It is inconceivable why these two SSSI's have appeared in LP2034. The unimaginable loss of our beautiful countryside and criminal destruction of nature and wildlife will be because SODC's failure to follow the correct assessment process.

Sustainability Appraisal

The last Sustainable Transport study (2017) is now out of date and were focussed on other areas. Oxford City Council (OCC) have proposed a road through LNBB. Land east of Bayswater Road (part of old Wick Farm site) to the A40 which would provide relief for the Green Road Roundabout at Headington.

This proposed road from Highways in the OCC is solely interested in 'improving traffic flow' but with not one iota of interest in how it might affect the areas it flows through. There has been no detailed analysis about these infrastructure proposals and their potential impacts which should have been addressed before selecting LNBB as a strategic allocation.

When taking the bus into Oxford City which travels through Barton via Bayswater Road, the bus in the morning is held up because there are shocking traffic queues on Bayswater road which go way back past The Crematorium every weekday.

Next to the top end of Bayswater Road there is Bayards Hill Primary School and Oxfordshire Centre for Music school.

SODC and OCC acknowledge that developing LNBB will increase pressure on the existing local road network (Bayswater road, A40 Green Road Roundabout, Marston Junction) and will therefore increase the existing and potential impacts of increased congestion, the continuing safety hazards of more heavy traffic to these schools and houses on Bayswater Road, and the long term harmful effects of traffic air pollution to our health.

SODC have not conducted an up-to-date site specific transport assessment NOR an air quality risk assessment to consider how or whether these negative impacts could be mitigated.

In its failure SODC has not provided adequate Sustainability Appraisals to support the selection LNBB.

The SODC states their version for LP2034.

South Oxfordshire will remain a beautiful and prosperous place to live. It will be an attractive place for people to work and spend their leisure time.

The pressure is on SODC to meet a deadline set by the Growth Deal. LP2034 was rush through and the council have moved directly to a regulation 19 consultation of only six weeks which began on 7 January 2019 so all proceedings could be finalised to meet the Growth Deal deadline of 31st March 2019.

The SODC have not provided adequate time to read and digest all the documents to get an informed view of the technical compliance of this New Plan LP 2034 with the National Planning Policy Framework (NPPF).

In LP2034 there are major road proposals and LNBB should have had a minimum evidence-based transport assessment. SODC should, to be legally correct, have to commission new assessments to be compliant with NPPF.

My concerns are that SODC have not met their legal requirements in submitting the document LP 2034.

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?

No

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

I would like to be added to the database to receive planning policy updates for Vale of White Horse