

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

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"/>	<input type="text"/>
Full Name	Max Lehmann and Victoria Woolley	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address	<input type="text"/>	<input type="text"/>

For information on **sharing your details**: please see page 3

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:

STRAT 9; and more general comments

Do you consider the Local Plan and supporting documents:

(1) are legally compliant

Yes

No

Don't know

(2) are sound

Yes

No

Don't know

(3) comply with the Duty to Cooperate

Yes

No

Don't know

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.

STRAT 9 proposes a new settlement of 3,500 houses on Green Belt land between the Culham Science Centre and the Europa School, on land to the north of the A415. It is asserted that there are exceptional circumstances to justify this development in the Green Belt; yet the Plan does not provide adequate evidence of such circumstances. STRAT 9 is one of seven Strategic Allocations for new housing, of which six are in the Green Belt. This appears to indicate an intention on the part of the District Council to ignore government guidance on the Green Belt in pursuit of a policy of maximising housing development. It is also in conflict with the Council's own STRAT 1, which commits the Council to "protecting and enhancing the countryside and particularly...the Green Belt..." (see pages 29, 30).

Moreover, the process adopted for determining the number of new houses required in the District during the Plan period and beyond is based on out-of-date calculations of Need (using the SHMA of 2014) which have been further inflated to arrive at a Supply figure of 28,465 for the Plan period, compared with a Need of 22,775 according to the District's original calculations (though this figure itself deliberately inflated the need, even calculated according to the SHMA formula). This appears fundamentally unsound methodologically, and is certainly not an appropriate basis for justifying the development of new Strategic Allocation sites in the Green Belt, when the true need has not yet been assessed, but on the face of it will undoubtedly be a much reduced figure.

The proposed new housing at Culham would inevitably add significantly to the pressure on the local road system, which is currently, according to the Oxfordshire County Council Traffic Authority, over capacity. Although there are plans for a new Thames crossing and a Clifton Hampden bypass, in an effort to alleviate local congestion, funding has not been identified for these new roads, and it is already doubtful whether they would provide an adequate solution with significantly increased volumes of peak period traffic. The number of commuter car journeys created by the proposed Culham development would be significant; it is unrealistic to rely on the Culham Science Centre to provide enough new jobs to avoid this, given the scale of operations there: in 2014, there were around 2,000 jobs at the Centre, with plans then to increase that number by a further thousand, so for

the Culham development to become in effect a Science Centre dormitory would require a heroic and entirely unlikely level of expansion of the Centre. Alternative modes of transport are also unlikely to help: the currently vestigial passenger railway service at Culham station cannot, we are told, be improved without a major investment, involving doubling the Didcot to Oxford section of the line to four tracks from two; and there is currently no bus service along the A 415 serving the Science Centre. Given the present transport infrastructure reality and the uncertainty surrounding plans for improvement, it seems at the very least unsound to propose a small town of 3,500 households and associated institutions at Culham.

Finally, we are concerned that SODC has not adequately consulted local parish councils or Abingdon Town Council in the preparation of the Local Plan.

(Continue on page 4 if necessary)

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.

It is difficult to provide a comprehensive set of suggestions: the latest version of the District Plan shows all the signs of having been redrafted and approved for consultation through the council's committee process to a very tight deadline, and in our view needs a more thorough review. As a starting point we should like to see STRAT 9 removed, and more generally the housing target revised to reflect the most recent government guidance; and before putting forward Green Belt sites for new housing developments, the Council should consider alternative, non-Green Belt options; the next version of the Plan should set what options have been considered, together with the grounds for ruling out those deemed unsuitable.

(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: 9 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

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.**

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

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