

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" value="Mr"/>	<input type="text" value="Mr"/>
Full Name	<input type="text" value="Mark Blandford-Baker"/>	<input type="text" value="Stephen Pickles"/>
Job Title (where relevant)	<input type="text" value="Home Bursar"/>	<input type="text" value="Policy Planner"/>
Organisation (where relevant)	<input type="text" value="Magdalen College"/>	<input type="text" value="West Waddy"/>
Address Line 1	<input type="text" value="c/o agent"/>	<input type="text" value="The Malthouse"/>
Address Line 2	<input type="text"/>	<input type="text" value="60 East St Helen St"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text" value="Abingdon"/>
Postcode	<input type="text"/>	<input type="text" value="OX14 5EB"/>
Telephone Number	<input type="text"/>	<input type="text" value="01235 523139"/>
Email Address	<input type="text"/>	<input type="text" value="[REDACTED]"/>

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:

Policy ENV4 & paragraphs 8.18 – 8.26

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.

Magdalen College has a proposal to build rowing and boathouse facilities in the field adjoining the southern end of Sandford as identified on the attached plan (Drawing nos L01), which would necessitate the provision of a hard edge to the river for part of the site frontage. The provision of these facilities is key to the development of the senior boats of Magdalen College, along with three other colleges of the University who will shortly lose the opportunity to boat from Radley College boathouse in Lower Radley. (Senior boats typically refers to the men's and women's first eights.) The new boathouse, however, would not just be for the members of the four colleges but also for the advancement of non-competitive rowing for the local community. As the Colleges' use will account for only about half a year, there would be a lot of scope for use by local groups in this way. This includes the expansion of various development, participation and taster opportunities in rowing locally, for example the Oxford Junior Rowing Course (OJRC), who are working closely with Magdalen College. One of the key aims is to develop non-competitive recreational rowing for children and young people. The existing local clubs are at bursting point with insufficient capacity to take on more members or potential members in any age group, but particularly with juniors. To add to this, the Oxford Junior Rowing Course make use of the existing Magdalen College boathouse on the Isis in the city centre, but the site is in Christ Church Meadow which is difficult for parents and children to access and the river is very busy. The users of the river in central Oxford include around thirty college clubs; two city rowing clubs; a school; a recently formed paddle boarding club; canoe club; holiday makers in boats; tourists in punts and Salters' Steamers. This causes major problems for the necessary rigorous risk assessments and is the reason why it is essential to find a less busy location, where children can practice rowing. For additional information on the need for the proposed new rowing facility, please see the further comment section of this form.

The stretch of river at Sandford offers a four mile stretch used only by Radley College, and even then only in term time during afternoon sport sessions, and therefore represents a very suitable location for the provision of this facility. The facility would, however, need to be provided on undeveloped land outside of the settlement boundary which is owned by Magdalen College, as the area around Sandford Lock is already intensively developed and land which Magdalen College own adjoining the river is restricted to undeveloped land immediately to the south of Sandford.

Rowing is not just a competitive sport but also a recreational activity and thus appeals to a wide variety of people. Magdalen would wish to contribute to the local community by making a new boathouse available to others to use in this way. What the OJRC plans to offer at the proposed new Magdalen College rowing and boathouse site would be a valuable community youth facility aimed at broadening the recreational use of the river among children, helping to spread what has sometimes been felt to be an elitist sport to a far wider user base than it currently enjoys, as the children come from local state schools. It would thereby have an important equal opportunities role by enabling all young people in Oxford and nearby areas to have the opportunity to participate in rowing. Another element of rowing that they are keen to develop at the new site, but are unable to at present due to access and congestion issues, is adaptive rowing for the disabled. The proposal would therefore provide a valuable sporting facility, which would also provide a number of associated benefits, such as improving childhood mental health, teamwork and life skills. In this way it would make a significant contribution towards achieving the benefits which the National Planning Policy Framework (NPPF) notes arise from the provision of sports facilities, which it states: *'enable and support heathy lifestyles,'* (para 91). Paragraph 96 also notes that *'opportunities for sport and physical activity is important for the health and well-being of communities.'*

However, Magdalen College has concerns that as presently worded policy ENV4: Watercourses of the South Oxfordshire Local Plan 2034 could frustrate the College's ambition to provide this new sporting facility. This is because clause 4 of this policy states that: *'outside settlements, proposals for mooring stages will not be permitted. Proposals for posts, earthworks or facing riverbanks with piles and planking will not be permitted except under exceptional circumstances and in agreement with the Environment Agency.'* Clause 2 could also potentially cause problems as it states that: *'Development should include a minimum 10m buffer zone along both sides of the watercourse to create a corridor favourable to the enhancement of biodiversity.'* There is therefore a policy presumption against any proposal that would create hard bank structures anywhere outside of settlements. The formulation of the wording of this policy has clearly given no consideration to the implications of such a restriction on water sport activities on the River Thames. The river bank of the Thames in South Oxfordshire is almost entirely rural and most villages have very little settlement adjoining the river. The only exceptions are the settlements of Wallingford; Goring and Henley on Thames, but in each of these cases the area adjoining the river is in a Conservation Area; and the riverbank is either already intensively developed or adjoined by parkland or domestic rear gardens resulting in very few, if any, opportunities for new water sport facilities to be established within settlements. In order to enable new water sport facilities to be provided it is therefore essential that provision is made for their establishment outside settlements, as is already the case with the Radley College Boathouse and Oxford Brookes University boathouse. It is therefore imperative that the policy is revised to provide a form of wording that would facilitate the provision of new water sport facilities on suitable sites.

This would also accord with the Council's Part 2 'Sports Facilities Strategy,' which forms part of the evidence base for the Local Plan 2034 and states that in relation to water sports the Council's role will continue to be:

- *'As an advocate working with partners to gain and retain access to a wide range of "natural resources", including along the River Thames.*
- *Providing positive planning policy guidance to encourage provision for, and access by, a range of sport and recreation activities'* (para 12.22)

This clearly therefore envisages a positive supporting role. This is also reflected in policy CF3 which states that: *'Proposals for sport and recreation facilities will be encouraged and supported, in line with other policies in the Plan, and Sport England guidance. Where possible new sports and recreation facilities should be co-located with other community uses and be well related to the settlements they serve, being sited within or adjacent to settlements.'* This acknowledges that sites adjacent to settlements are one of the preferred locations for new sporting facilities and where this is not possible, other more rural locations such as those occupied by the boathouses occupied by Radley College and Oxford Brookes University would be suitable.

As the effect of policy ENV4 would be to prevent new water sport facilities being provided on watercourses in South Oxfordshire, the policy is inconsistent with the NPPF; the Council's own Sports Facilities Strategy and proposed Local Plan policy CF3. It is therefore unsound as it is not consistent with national policy; nor is it justified as it is not an appropriate strategy as there is no indication that the Council has taken into account the impact of policy ENV4 on preventing the provision of additional water sport facilities in South Oxfordshire. Paragraph 31 of the NPPF states that *'the preparation and review of all policies should be underpinned by relevant and up-to-date evidence.'* This is clearly not the case in this instance as there is no indication that the Council has had regard to the implications of this policy for the provision of water sport facilities.

There has also been no recognition of the effects that policy ENV4's prevention of additional mooring facilities outside settlements would have on water sport provision in the documents that support the Local Plan. The Sustainability Appraisal's evaluation of the impact of Policy ENV4 on Sustainability Appraisal objective 3, which is *'to improve accessibility for everyone to health, education, recreation, cultural, and community facilities and services,'* is that *'there is no relationship between' this policy 'and this objective,'* which quite clearly is not the case. (page N90). Similarly, the 'Equality and human rights impact check,' states on page 34 that in relation to policy ENV4 *'no direct impact to equality groups identified.'* As the assessment includes the impact on people who face barriers due to disability and income and the policy would prevent new rowing facilities being provided outside settlement boundaries, which would be provided specifically with the objective of improving access to rowing to all children including those with disabilities, this assessment is also clearly not correct.

(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.

The following changes outlined in bold and underlined below are considered to be necessary to enable policy ENV4 to support the provision of new water sport facilities adjoining the Thames, while also ensuring that the environment of the watercourse is protected and thereby address the soundness issues raised above:

Modify clause 2 to state: *'Development should include a minimum 10 m buffer zone along both sides of the watercourse to create a corridor favourable to the enhancement of biodiversity, **apart from where there is a need for a water sport facility to be provided.** **In such cases the amount of hard surfaced development should be kept to the minimum needed to enable the sporting facility to be provided.**'*

Modify clause 4 of policy ENV 4 to state: *'Outside settlements, proposals for mooring stages will not be permitted, **apart from water sport facilities that need to be located adjacent to the watercourse.** Proposals for posts, earthworks or facing riverbanks with piles and planking will not be permitted except **for water sport facilities and** under exceptional circumstances ~~and~~ in agreement with the Environment Agency.'*

(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: 14.2.19
(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.**

Further information regarding the need for a new boathouse for Magdalen College at Sandford -on-Thames to support the representations on pages 2 – 4 of this form, which contend that proposed policy ENV4 on watercourses is unsound:

Magdalen College, along with three other colleges of the University, have for many years (since 1859 in Magdalen's own case) boated their senior boats (typically their men's and women's first eights) from Radley College boathouse in Lower Radley.

In October 2018 Radley gave notice to the four colleges that it would soon be no longer able to accommodate them in terms of rack spaces and launch mooring owing to expansion at the school and other school demands on the facilities at the boathouse.

The colleges boat these senior crews from Radley because the Isis (the stretch of the River Thames through the city of Oxford) is so crowded and busy with other users, rowers and others, and variable levels of experience, such that it is impossible to undertake proper and safe training. Coaching on the Isis is limited to using a bicycle which reduces the quality of communication with the crew and adds safety risk.

Other colleges have moved senior boats away from the Isis to Godstow, Abingdon or even Wallingford. These locations are themselves now 'full'.

Magdalen and the other three colleges are anxious to remain on the stretch of river between Sandford and Abingdon locks precisely because it is (a) relatively quiet, (b) is long in overall length, (c) has some ideal stretches for training pieces by virtue of limited bends and the compatibility of the lengths to training needs. This stretch has no other rowing than Radley and this influences the relative quietness, but there is little other use of the stretch beyond through traffic and fishermen. The latter live in reasonable harmony with other river users as the width provides space for all.

Since Magdalen owns the farm land south and east of Sandford, with appropriate access, and the willingness by the tenant farmer to return part of one field to the College, it makes a very good place to look for facilities as a new, alternative, base to Radley. Students can cycle to Sandford without difficulty, so there are no traffic implications.

British Rowing, the national governing body (NGB) for the sport, seeks to encourage and increase participation in the sport as part of its core function and, in common with other sports' NGBs, to improve the health of the population through activity, giving both physical and mental health well-being benefits.

To this end a new boathouse would not just be for the members of the four colleges but also allow for expansion of various development, participation and taster opportunities in rowing locally. The existing local clubs are at bursting point with insufficient capacity to take on more members or potential members in any age group, but particularly with juniors.

Rowing is not just a competitive sport but also a recreational activity and thus appeals to a wide variety of people. Magdalen would wish to contribute to the local community by making a new boathouse available to others to use in this way. It is worth remembering that university terms account for about half a year and so there is a lot of scope for unencumbered use by local groups.

Magdalen has already partnered a trial season with the Oxford Junior Rowing Course using its base on the Isis. Both the College and OJRC hope that the chance to operate from south of Sandford would enable the latter to grow. This has the wider benefit of being much more accessible for children and their parents than via Christ Church meadow. Sandford affords a much more convenient and safe dropping off arrangement by virtue of public parking (for those who need to drive), close to the site of the proposed boathouse.

Magdalen members tend to be on the river in the early morning (after sun rise) in the autumn and winter, before going to lectures and tutorials, and in the evening in the April to June period. Broadly speaking, this means they are on the river when an already quiet stretch is little used and so there is no impact on other users or neighbours.

In formulating this plan Magdalen has looked at other locations and opportunities, but as noted in the third and fourth paragraphs above, there are none that are suitable or could sustain further pressure.

Further information about the Oxford Junior Rowing Course can be obtained from the following link: <https://www.oxfordjuniorrowingcourse.co.uk/>

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).

Please return this form 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.