

2 November 2020
Delivered by email

Planning Policy
South Oxfordshire District Council
135 Eastern Avenue
Milton
Abingdon
OX14 4SB

Ref: A2 R3001

Dear Sir / Madam

SOUTH OXFORDSHIRE LOCAL PLAN 2035 – REPRESENTATIONS ON BEHALF OF A2DOMINION

These representations are submitted on behalf of A2Dominion to the consultation on the South Oxfordshire Local Plan 2035 Main Modifications.

As a general point, A2Dominion retain their overall objections to the draft Local Plan as expressed through earlier consultations.

STRAT1

Regardless of A2Dominion's general comments on the Local Plan, STRAT1 should be revised to provide clarification to readers of the Plan and to ensure consistency with national policy.

Policy STRAT1 refers to "Protecting and enhancing the countryside". Since this Plan is being examined under the NPPF 2019, we note that national planning policy does not establish that local planning policies should 'protect and enhance' the countryside, and instead the relevant requirement is (at 170(b) of the NPPF) that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland"

Setting a policy to 'protect and enhance the countryside' is only likely to cause confusion as to the consistency of that policy with the NPPF.

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STRAT3

The specific change in bullet point 6 of the Policy is welcomed and it is considered that the Didcot Garden Town boundary should be shown on the Proposals Map as well as in Appendix 6 given its policy significance.

The Policy explains that proposals within the Masterplan Area (or the Masterplan Area Boundary as defined in Appendix 6) should be in accordance with the principles in the Policy. In A2Dominion's opinion, a site which is not specifically allocated may equally be able to demonstrate compliance with those principles.

Policy H1

A2Dominion consider that Policy H1 sets a confusing approach, the outcome of which could, theoretically, support large scale development adjacent to small scale, less sustainable settlements, when, on our understanding, the LPA's view is that sites which are in more accessible/sustainable locations but outside of built up areas should be resisted.

Appendix 6

The change to the heading of Appendix 6 to refer to Didcot Garden Town Boundaries is welcomed.

The retention of the map / image showing the 'Didcot Garden Town Masterplan and Boundary' is welcomed.

Yours sincerely



Donna Palmer
Associate Director

