

South Oxfordshire Local Plan Proposed Main Modifications Consultation Comment Form

Please return by midnight on Monday 2 November 2020 via email planning.policy@southoxon.gov.uk or post to Freepost SOUTH AND VALE CONSULTATIONS (no stamp is needed and no further address is needed)

This form has two parts:
Part A – contact details
Part B – your comments

Part A

Are you responding as an: (please tick)

Individual

Business or organisation

Agent

A name and contact details are required for your comments to be considered.

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="Stuart Field"/>	<input type="text" value="Mark Sitch"/>
Organisation (if relevant)	<input type="text" value="L&Q Estates"/>	<input type="text" value="Barton Willmore"/>
Job Title (if relevant)	<input type="text"/>	<input type="text" value="Senior Partner"/>
Address Line 1	<input type="text"/>	<input type="text" value="9<sup>th</sup> Floor"/>
Address Line 2	<input type="text"/>	<input type="text" value="Bank House"/>
Address Line 3	<input type="text"/>	<input type="text" value="8 Cherry Street"/>
Postal Town	<input type="text"/>	<input type="text" value="Birmingham"/>
Postcode	<input type="text"/>	<input type="text" value="B2 5AL"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
Email Address	<input type="text"/>	<input type="text" value="REDACTED"/>

Sharing your personal details

Your name, contact details and comments will be shared with the Planning Inspector and a Programme Officer, who acts as a point of contact between the Council, Inspector and respondents.

This means that you may be contacted by the Programme Officer or the Council with updates and in relation to any necessary consultations on the Local Plan. This is in accordance with Regulation 19 and 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 and Regulation 102 of The Conservation of Habitats and Species Regulations 2017.

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.

Comments submitted by individuals will be published on our website, alongside their name. No other contact details will be published. Comments submitted by businesses and/or organisations will be published, including contact details.

Please refer to our Privacy Notice regarding how your personal data is used for this consultation, available on our website southoxon.gov.uk/newlocalplan. If you would like to know more about the councils data protection registration or to find out about your personal data, please visit: southoxon.gov.uk/dataprotection

Future contact preferences

As explained above, 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 consultation 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

Part B – Please use a separate sheet for commenting on each proposed main modification or consultation document

You can provide your comments on the Emerging South Oxfordshire Local Plan Proposed Main Modifications in this section.

The list of documents you can comment on are:

- Schedule of Proposed Main Modifications
- Schedule of Policies Map Changes
- Sustainability Appraisal Report Addendum
- Habitats Regulations Assessment Addendum

Please note we are inviting comments on the Proposed Main Modifications and documents listed above only - this is not an opportunity to make comments on any other part of the Plan.

If you are commenting on the Main Modification document, please provide the main modification number (for example MM1) in the box below.

If you are unsure of the 'modification number', please refer to the Schedule of Proposed Main Modifications.

If you are commenting on any of the other consultation documents (for example the Sustainability Appraisal Addendum), please provide the relevant section, paragraph or page number in the box below:

Modification Number or Document, section, paragraph or page number

MM4, MM5, MM8, MM9, MM16, MM29, MM61, MM63, MM66, MM71, Paragraph 3.8.20 of the SA and Paragraph 3.1 of the HRA

Please provide your comments below:

If your comments are over 500 words it would be really helpful if you could also provide a summary of your comments using the text box in the next question.

If you wish to include any supporting documents, please attach them to this comment form.

Please refer to our enclosed Representations letter dated 2nd November 2020.

(Continue on page 5 if necessary)

If your comments cover more than the boxes provided, please use the space below to provide a summary. You are not required to summarise your comments, but a summary would help us in our reporting.

Please provide your summary below:

Please refer to our enclosed Representations letter dated 2nd November 2020.

Thank you for your comments.

Please return by midnight on Monday 2 November 2020 via email planning.policy@southoxon.gov.uk or post to Freepost SOUTH AND VALE CONSULTATIONS (no stamp is needed and no further address is needed)

Planning Policy
South Oxfordshire District Council
Freepost
SOUTH AND VALE CONSULTATIONS

SUBMITTED VIA EMAIL ONLY: planning.policy@southoxon.gov.uk

25537/A3/SJ/JE/MXS

2nd November 2020

Dear Sir/Madam,

**SOUTH OXFORDSHIRE LOCAL PLAN MAIN MODIFICATIONS CONSULTATION
RESPONSE FROM BRASENOSE COLLEGE AND L&Q ESTATES**

Thank you for inviting comments on the proposed Main Modifications to the South Oxfordshire Local Plan (SOLP). We respond on behalf of Brasenose College and L&Q Estates in relation to Land at Northfield (Policy STRAT12).

This response follows on from our previous extensive engagement in the Local Plan preparation and Examination hearings. We set out our specific comments on the Main Modifications in the order they appear, with reference to the tests of soundness. Where we have objected to a proposed Main Modification, we have proposed alternative wording for your consideration. Lastly, we note and comment on the updates to the Sustainability Appraisal and Habitat Regulations Assessment for the SOLP Main Modifications.

Land at Northfield ('the site') was identified as a draft strategic allocation in the Final Publication Version of the SOLP (2019). The retention of the allocation of the land at Northfield for approximately 1,800 new homes, supporting services and facilities following the conclusion of the Examination Hearing Sessions and this Main Modifications consultation is welcomed. In the Inspector's Preliminary Conclusions and Post Hearings Advice letter (August 2020, Examination Document IC12) he considers the overall SOLP Spatial Strategy and strategic site allocation for Land at Northfield at STRAT12 to be sound.

MAIN MODIFICATIONS (MM) COMMENTS

MM4

Main Modification 4 proposes a new paragraph (4.11) to Policy STRAT1: The Overall Strategy to reflect the importance of climate change issues following the recently declared climate change emergency by South Oxfordshire District Council (SODC). The proposed new text recognises how the overall spatial strategy supports growth in locations that help to reduce the need to travel,

including allocations adjacent Oxford City. Reference to Appendix 16 is also included, which highlights the elements of the Local Plan that help address climate change issues.

The proposed new text at MM4 is considered sound and is supported. As an allocation adjacent to Oxford City, Land at Northfield represents a highly accessible site connected to existing employment, services, facilities, walking and cycling routes which serves to help address climate change issues in the District.

MM5

Main Modification 5 proposes amendments to the text of Policy STRAT2: South Oxfordshire Housing and Employment Requirements. This updates the housing growth requirements to account for an extend plan period up to 2035 and to reflect the updated stepped delivery requirements. The proposed amendments include reference to the housing growth requirements being a 'minimum'. The Local Plan will support the delivery of 23,550 new homes over the plan period (2011-2035) comprising 18,600 homes for South Oxfordshire (minimum requirement) and 4,950 homes to address Oxford's unmet housing need. The stepped requirement reflects the anticipated delivery trajectories for the strategic allocations and reflects the anticipated delivery rates of existing commitments within the housing land supply.

We support the proposed amendments and consider them to be sound, particularly the references to the South Oxfordshire housing requirement being a 'minimum' and the specified housing requirement for accommodating Oxford's unmet housing needs.

We support the overall housing requirement identified (23,550 new homes). It represents a robust growth requirement which will support the economic growth ambitions of SODC and wider growth objectives for the sub-region as part of the Oxfordshire Housing and Growth Deal (OHGD). The provision of 4,950 homes to address Oxford's unmet housing needs is in accordance with the OHGD and is consistent with the approach taken by adopted Local Plans in the Oxfordshire area to date.

We have previously submitted representations and provided our own evidence in support of the housing requirements and stepped trajectory (see our Matters 1 and 2 Statements (June 2020) and our response to the SOLP Final Publication Version consultation (February 2019), including our Housing Need Technical Review). We confirm that we have provided information in relation to Land at Northfield to support the proposed stepped trajectory and consider this to be a robust approach towards housing delivery over the Plan period (see our Matter 2 Statement, June 2020).

MM8

Main Modification 8 proposes new text to Policy STRAT5: Residential Densities. This is in response to issues raised during the Examination in relation to Matter 4, including concerns we raised in our Matter 4 Statement (June 2020). Reference to specific densities have been deleted and replaced with new text that provides a criteria-based approach (bullet points 1-5) for assessing the most appropriate density of development to be achieved for individual sites and strategic allocations.

We support bullet point 1 of the proposed amendment policy text which requires proposals to 'optimise' the use of the land and the potential of a site. This revised wording ensures consistency with NPPF paragraphs 122 and 123 and provides flexibility for an appropriate site-by-site response.

Main Modification 8 proposes new text to paragraph 4.56. This is in response to issues raised during the Examination in relation to Matter 4, including concerns raised in our Matter 4 Statement (June 2020). This supports opportunities to optimise the density of development and site capacities but notes that the design of a site needs to have regard to the existing character of a local area and any local circumstances. Whilst this modification is broadly supported, the proposed text should be amended to reflect the housing requirements for the individual strategic site allocations for clarity and to ensure consistency with other SOLP policies (for example, Policy STRAT12). The text should also be amended to ensure the policy supports opportunities for enhancing the local character (or

creating new high-quality character) not just replicating the existing. This is consistent with NPPF paragraphs 122(d) and 127(c)). It would also be consistent with SOLP Policy DES2: Enhancing local character which identifies the need to enhance, not just replicate local character. We propose the following amended wording to provide such clarification (MM text in bold and our proposed amendments shown in red) -

Whilst there are opportunities to optimise density of development to maximise the capacity of sites (where allocated in line with their development requirements), the design of a site needs to pay careful attention to the existing character of a local area and any local circumstances, taking account of a range of social and environmental constraints, accessibility and amenity issues. Opportunities to enhance local character should be considered.

Main Modification 8 also proposes a new glossary definition of 'net density'. It defines the site areas that will be used for calculating net dwelling density. These site areas are specified as those that will be developed for housing and directly associated uses, including access road/s, private gardens, car parking, incidental open space, landscaping and play areas.

We object on the basis that it does not sufficiently distinguish between private space and the public realm. The definition should be amended to include reference to the site areas only including private car parking areas; it should not include visitor or other public parking areas. The inclusion of play areas within the site area should also be removed.

MM9

Main Modification 9 proposes text amendments to Policy STRAT6: Green Belt, to reflect the compensatory measures in line with paragraph 138 of the NPPF.

We note that Land at Northfield will provide a range of compensatory measures as set out in our previous representations to the SOLP Examination (see our Matter 6 Statement, paragraphs 16-17 as well as a supporting Green Belt Environmental Quality Improvements Plan and a Connectivity Plan at Appendices 1 and 2 to the Matter 6 Statement). As an example, significant improvements will include natural play areas and native woodland planting to existing Green Belt at the east and south of the site.

MM16

Main Modification 16 sets out the proposed revisions to the policy supporting the Northfield strategic allocation (Policy STRAT12: Northfield). We support the amended Concept Plan (at Appendix A) as this reflects changes requested via our previous representations.

We also support the proposed deletion of bullet point (2) of Policy STRAT12 which previously referred to site specific development densities at Policy STRAT5.

We support the proposed amendment at bullet point (2) (iii) of Policy STRAT12 which for clarification purposes has been updated to reflect the likely educational requirements for the site, including 'for up to' a new 3-form entry primary school and appropriate contributions towards off-site secondary and Special Education Needs provision. This reflects the outcomes of our discussions with the OCC Education team and SODC.

The proposed amendment at bullet point (2) (vi) (a) inserts references to the public rights of way network in the context of necessary transport improvements for the site (through direct mitigation or contributions). Whilst we are supportive of the additional reference to public rights of way, we consider the policy provisions should only reasonably relate to the network that is in the immediate

vicinity of the site. This should be clarified within the policy text. We propose the following amended wording to provide such clarification (MM text in bold and our proposed amendments shown in red)

-

- a) Provision and contribution towards cycling and walking infrastructure **and the public rights of way** network on and off site (within the vicinity of the site) ensuring the site is well connected to Oxford City, **and** appropriate surrounding villages

The proposed additional new criterion at bullet point (2) (vi) (e) of Policy STRAT12 refers to upgrades at existing junctions on the Oxford Eastern bypass (A4142) including Cowley junction. This is proposed following further representations to the SOLP by OCC and a subsequent Statement of Common Ground with OCC (SCG03, June 2020). The updates have been included to ensure the information regarding transport improvements is accurate.

We object to this proposed Main Modification on the basis that it is not justified. Whilst we recognise and support the reference to necessary upgrades of the Cowley junction, we are unclear what evidence is available to support the open reference to upgrades at other existing junctions along the Oxford Eastern bypass. Based on our site assessment work to date and discussions with OCC/SODC we understand the only necessary upgrades for delivery of the site relate to the Cowley junction. Whilst the potential need for upgrades to the A4074 'Golden Balls' junction have been identified by OCC previously, as set out in our Matter 7 Statement (paragraph 2) we consider that the level of traffic that will pass through this junction in the AM and PM peak hours is unlikely to be material. Works to upgrade this junction are not in our view required to mitigate any impact arising from the development of Land at Northfield. No other junction upgrades along the A4142 have been identified, as necessary.

The modification creates an open reference to potentially all existing junctions along the Oxford Eastern bypass. Based upon our understanding, and following correspondence with OCC to date, the only necessary upgrades relate to the Cowley junction. The proposed modification as set out at present is not justified by the evidence available. Should OCC and SODC consider there is a need for specific necessary junction upgrades beyond the Cowley junction then these should be evidenced and detailed in the proposed policy wording to provide clarity. Therefore, subject to any further information provided by the Council, we consider that the proposed policy wording should be amended to read as follows -

e) upgrades to the existing Cowley junction on the Oxford Eastern bypass (A4142)

The proposed amendments to Policy STRAT12 bullet point (3) refer to the concept plan as 'indicative' and include reference to the involvement of Oxford City Council in the preparation of the masterplan. We support these amendments. We would request that future meetings related to the masterplan are attended jointly by officers from SODC and Oxford City Council.

At bullet point (3) (v) a new criterion is proposed to reflect the need for a net gain in biodiversity. Whilst we support the principle of the amendment, we object to the wording which specifies 'any residual impacts.' This is not considered to be consistent with national policy as it could lead to offsetting requirements which are not necessary or fairly and reasonably related in scale and kind to the scheme in line with NPPF paragraph 56. The proposed policy wording should be amended as follows (MM text in bold and our proposed amendments shown in red) -

(3) (v) a net gain in biodiversity through the creation and restoration of habitats along the course of the Northfield Brook and biodiversity enhancements integrated into the masterplan with ~~any~~ residual impacts offset through a recognised biodiversity offsetting scheme.

At bullet point (3) (vi) a new criterion is proposed to reflect the most appropriate site-specific density for the development overall, as well as proposals for variations in the density within the site. These variations reflect key elements of the surrounding existing character and proposed layout of the site. We support this proposed criterion as it reflects the outcome of our discussion with SODC on the indicative concept plan for the site, including the identification of Oxford Road as the key transport corridor where higher density development could be achieved. Related to this proposed amendment we also support the deletion of former bullet point (3) (v) which referenced maximising densities along key transport corridors. The replacement bullet point (3) (vi) now provides more detailed provisions for the density of development on the site.

At bullet points (3) (vii) and (viii) two new criteria are proposed. These relate to the provision of high-quality walking and cycling routes within the site and the provision of infrastructure to support public transport through the site. We support these proposed criteria, and these elements are reflected within the indicative concept plan for the site.

A new paragraph is proposed prior to existing paragraph 4 within Policy STRAT12 which relates to the archaeological evaluation requirements for the site as part of the planning application process. We support this new paragraph as it reflects the outcomes of our discussions with SODC during the Hearings.

At paragraph 4.103 an amendment is proposed to provide additional information about the site from a transport perspective and highlight the opportunity for good transport links that the site presents. We support the proposed amendment and consider that this demonstrates the existing locational advantages of the site as well as the opportunities for improvements arising from the allocation.

At paragraph 4.106 an amendment is proposed to refer to transport as an area which will benefit from developer contributions and upgrades associated with the allocation. We support this proposed amendment. The text reflects the outcomes of our discussions to date with SODC on the indicative concept plan and expected developer contributions to infrastructure upgrades.

MM29

Main Modification 29 proposes amendments to paragraph 5.51 to Policy H11: Housing Mix. The proposed text refers to using the latest evidence, monitoring and delivery data to inform decisions on the appropriate mix of housing on residential developments. It is considered necessary to ensure consistency with the NPPF and it addresses concerns raised as part of the Examination Hearings.

We support the proposed amendment as we consider it is consistent with NPPF paragraph 61 and helps ensure the policy is effective by reflecting the latest evidence on housing mix requirements.

MM61

Main Modification 61 proposes amendments to criteria (1) of Policy EP1: Air Quality in respect of the Council's Developer Guidance Document, Air Quality Action Plans, national air quality guidance and local transport plans. The amendment replaces the requirement for developments to 'comply' with 'having regard to' in respect of these guidance documents and plans.

We support the proposed amendment as it reflects the advisory nature of the referenced documents, as well as the flexibility provided by guidance-based documents for site specific approaches for addressing air quality impacts where relevant.

MM63

Main Modification 63 proposes a series of amendments to criteria (1) of Policy DES1: Delivering High Quality Development in response to issues raised during the Examination.

We object to proposed criterion (1) (i) of the modification. We consider that it should be amended as follows in order to be consistent with MM8 (MM text in bold and our proposed amendments are shown in red) -

- i. ~~Uses land efficiently~~ Optimises the use of land whilst respecting the existing landscape character**

We object to proposed criterion (1) (v) of the modification. We consider that the reference to 'minimises energy consumption' should be replaced with '~~reduces energy consumption~~'. 'Minimise' is open to interpretation, potentially leading to overly onerous requirements, and it does not reflect the typical principles of the energy hierarchy which is to 'reduce' energy consumption. A reduction in energy consumption would be a more readily measurable indicator for implementation purposes making the policy more effective.

We object to proposed criterion (1) (xi) of the modification given its lack of clarity. We request further clarification on what is meant by 'provides access to local services and facilities.' It should be clarified whether this is reference to on-site provision of new local services and facilities or is referring to improved transport links to existing near/off site local services and facilities. What is considered 'local' should also be clarified in this respect.

We object to proposed criterion (1) (xvi) of the modification. Developments are unable to plan for 'possible' future development. The text should be amended as follows to be effective (MM text in bold and our proposed amendments shown in red) -

- xvi. ~~is designed to take account of possible future development~~ so that it does not preclude plan-led future development in the local area.**

The proposed modification also proposes an amendment to criterion (3) (previously criterion 6 of Policy DES1). This requires sites with similar delivery timescales that are coming forward together to prepare a comprehensive masterplan across all of the sites. We object to this modification as we consider further clarity is required to make the policy effective. This should specify that the criterion more appropriately applies to individual phases within an overall strategic site which would benefit from a comprehensive masterplan, rather than a masterplan being required across separate strategic sites. The proposed policy wording should be amended as follows (MM text in bold and our proposed amendments are shown in red) -

- ~~{6}~~ **(3)** Where the Council ~~is~~ are aware that ~~sites individual phases of a strategic development site~~ with similar delivery timescales are coming forward together, ~~they will require~~ **a coordinated, integrated and comprehensive masterplan will be required** to be prepared across all ~~the~~ sites.

MM66

Main Modification 66 proposes a series of amendments to the criteria specified at Policy DES4: Masterplans for Allocated Sites and Major Development. We object to the proposed amendments to criterion (1) (ii) which replaces the previous reference of 'encourage' with 'prioritise' in relation to walking, cycling and public transport connections. We consider that the previous reference to 'encourage' should be retained as it reflects the thrust of national policy which is to promote and encourage sustainable transport choices (with priority given to pedestrian and cycle movements - NPPF paragraph 91(c) and Chapter 9.

We support the proposed amendments to criterion (1) (vi) which reflects the need for the masterplans to be based on the principles of natural surveillance and active street frontages. We consider this proposed amendment is consistent with national policy related to achieving healthy, inclusive and safe places (NPPF, paragraph 91).

We support the proposed amendments to criterion (1) (ix) which reflects the need for the masterplans to demonstrate they have been prepared in consultation with the local community and other stakeholders. We consider this proposed amendment is consistent with national policy related to engagement on design proposals (NPPF, paragraphs 40, 124-129).

MM71

Main Modification 71 proposes amendments to Policy DES11: Carbon Reduction. This is to take account of SODCs climate change emergency declaration and associated motion to reach net-zero carbon emissions for the whole District by 2030 (Council Meeting 10/10/2019).

We support the principle, although object to the proposed policy wording on the basis that it is not justified and is potentially not consistent with national policy. The MHCLG Future Homes Standard Consultation (2019) document provided two carbon reduction proposals. It is noted that whilst the standard is not yet adopted, the target of 31% reduction against 2013 Building Regulations received overwhelming support from stakeholder responses. The 40% requirement proposed in Policy DES11 is therefore potentially more onerous than emerging national policy without any apparent local evidence to justify a higher local requirement.

We also object to the proposed policy wording on the basis that it is not effective. Further flexibility within the policy needs to be provided to enable site-specific solutions to be proposed which are dependent upon the individual site circumstances. This can be in the form of fabric, with the remaining energy coming from on and/or off-site measures. Renewable and other technologies are evolving all the time and the policy needs to allow for the future application of these changes.

There needs to be clarity provided on what the emissions baseline is as well as distinction between regulated energy (i.e. those services covered under Building Regulations) and total energy (e.g. plug-ins) for the policy to be effective in implementation.

Clarification is sought to understand which point the reduction in carbon emissions is applied and presumably this is at the point planning permission is granted. This provides certainty to inform the proposed scheme.

We also consider the reduction in carbon emissions should be referred to as net zero carbon for the reasons above.

We would ask the proposed policy wording be amended as follows (MM text in bold and our proposed amendments are shown in red) –

(1) Planning permission will only be granted where development proposals for:

- i) new build residential dwelling houses; or**
- ii) developments including 1,000m² or more of C2 use (including student accommodation); or**
- iii) Houses in Multiple Occupation (C4 use or Sui Generis) floorspace**

Achieve at least a 31% reduction in the carbon emissions from a code 2013 Building Regulations (in line with the Future Homes Standard or

future equivalent legislation) compliant base case. This reduction is to be secured through on and/or off-site renewable energy and other low carbon technologies ~~(this would broadly be equivalent to 25% of all energy used)~~ and/ or energy efficiency measures. Site-specific circumstances will be taken into account when considering the solutions available for achieving the reduction. ~~The requirement will increase from 31 March 2026 to at least a 50% reduction in carbon emissions and again from 31 March 2030 to a 100% reduction in carbon emissions (Zero Carbon).~~

SUSTAINABILITY APPRAISAL/HABITAT REGULATIONS ASSESSMENT 2020 UPDATES

The Main Modifications to the SOLP have been assessed with updates to the Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA). They consider the implications of the Main Modifications for the previous versions of the SA and HRA prepared in 2019 to support the SOLP Final Publication Version.

It is noted that many of the Main Modifications we have commented on do not give rise to any changes to the SA scoring. Overall, the SA notes (page 8, Conclusion) that the appraisal process has demonstrated that the proposed modifications do not impact on the previous conclusions of the 2019 SA. In relation to the Main Modifications to Policy STRAT12 for Northfield, the SA assesses the amendments to policy wording on biodiversity net gain, low carbon elements, density, primary school provision, specific requirements on walking and cycling routes, upgrades to road infrastructure. It notes (paragraph 3.8.20) that whilst a number of changes have been made to the appraisal commentary no changes have been identified to the appraisal scoring. We do not consider that any of the proposed amendments to the Main Modifications we have suggested in this response would give rise to SA implications given that they seek to provide further clarity only.

It is noted that most of the Main Modifications we have commented on do not give rise to any changes to the HRA conclusions. At paragraph 3.1 the HRA states that the overall conclusions of the 2019 HRA remain valid, which means that the SOLP, including Main Modifications, is not expected to result in adverse effects on the integrity of any European site, either alone or in-combination with other plans or projects. The HRA states that the Main Modifications to Policy STRAT12 for Northfield do not have any implications for the HRA 2019 findings as they do not result in any changes to the proposed quantum or location of development. The Council has also confirmed that the modifications in respect of the Main Modification reference to junction improvements along the Oxford Eastern bypass do not result in any changes to the assumptions underlying the transport model.

CONCLUSION

We have raised points of clarification and objection, but in the main support the Main Modifications put forward by the Council. We would request confirmation that these representations have been received and registered as duly made. We trust this submission is clear and helpful, but should you have any questions in relation to the above and/or attached please do not hesitate to contact Jessica Evans or myself.

Yours sincerely,



Mark Sitch
Senior Partner